



June 20, 2018

VIA ELECTRONIC MAIL ONLY

Austin R. Evers
foia@americanoversight.org

Tracking No: OGE FOIA FY 17/237

Dear Mr. Evers:

This is in response to your Freedom of Information Act (FOIA) request, which was received by the U.S. Office of Government Ethics (OGE) FOIA Office on March 9, 2017. In your request, you asked for:

1. Records containing or reflecting communications between OGE and individuals nominated, or anticipated to be nominated, by President Trump for Senate-confirmed positions in the federal government, including communications with attorneys or agents acting on behalf of such nominees or prospective nominees, as well as members of the Trump administration, the Trump transition team, or the Trump campaign about such nominees or prospective nominees.
2. Records containing or reflecting communications between OGE and individuals appointed, or anticipated to be appointed, by President Trump for positions in the Executive Office of the President in the White House, including communications with attorneys or agents acting on behalf of such appointees or prospective appointees, as well as members of the Trump administration, the Trump transition team, or the Trump campaign about such appointees or prospective appointees.

After clarification, you limited this request to exclude nomination notification emails, preclearance notification emails, and report transmittal emails. You also limited the request to a list of 17 White House appointees and 35 Presidential nominees subject to Senate Confirmation.

Because the responsive records are voluminous, we are providing you with a rolling response. Please find enclosed a ninth response. This set of documents contains records related to Environmental Protection Agency, Department of Health and Human Services, Small Business Administration and Department of the Treasury. In this batch, please find 239 pages subject to deletions made in accordance with FOIA Exemption 3, 5 U.S.C. § 552(b)(3) as material specifically exempted from disclosure by another statute; FOIA Exemption 4, 5 U.S.C. § 552(b)(4), as commercial or financial information obtained from a person and privileged or confidential; FOIA Exemption 5, 5 U.S.C. § 552(b)(5), as inter- and intra-agency pre-decisional deliberative process material; and FOIA Exemption 6, 5 U.S.C. § 552(b)(6), as information the disclosure of which would constitute a clearly unwarranted invasion of personal privacy. The



deletions are each marked with a reference “(b)(3),” “(b)(4),” “(b)(5),” or “(b)(6)” in the enclosed copies.

We are withholding approximately 115 pages in their entirety under FOIA Exemption 3, 5 U.S.C. § 552(b)(3) as material specifically exempted from disclosure by another statute, FOIA Exemption 4, 5 U.S.C. § 552(b)(4) as trade secrets and commercial or financial information obtained from a person and privileged or confidential, FOIA Exemption 5, 5 U.S.C. § 552(b)(5) as inter- & intra-agency predecisional deliberative process material, and FOIA Exemption 6, 5 U.S.C. § 552(b)(6) as information the disclosure of which would constitute a clearly unwarranted invasion of personal privacy. The withheld pages are attachments to emails provided in the 239-page release and are identified in that release.

OGE located additional responsive records that originated with the Environmental Protection Agency (EPA), Department of Health and Human Services (HHS), Small Business Administration (SBA) and Department of the Treasury (TREAS). We are sending these responsive records, along with a copy of your request, to the agencies mentioned above. The FOIA Requester Service Center phone numbers are, respectively: (215) 814-3424, (202) 690-7453, (202) 401-8203 and (202) 622-0930. We are asking the agencies to review the material and respond directly to you. The referred records are identified in the set of responsive documents provided to you.

Please note there are special access provisions for the following types of records:

- Public financial disclosure reports are not available under the FOIA, pursuant to FOIA Exemption 3, 5 U.S.C. § 552(b)(3) as material specifically exempted from disclosure by another statute. Instead, the Ethics in Government Act (5 U.S.C. app. § 105) and OGE regulations provide for a special access provision for public financial disclosure reports. You may use OGE’s online system to access these reports. Most of the reports you seek (i.e. nominees who occupy positions for which the pay is set at Levels 1 and 2 of the Executive Schedule) are posted on our website [here](#). Any other reports certified by OGE are available [here](#).
- Ethics agreements are available online at the same location as the public financial disclosure reports.
- OGE regulations provide for a special access provision for Certificates of Divestiture (CDs). OGE has created an automated tool to request copies of the CDs, available on OGE’s website [here](#).
- 18 U.S.C. § 208 provides for a special access provision for conflict of interest waivers. You may use the fill and print PDF version of the [OGE Form 201](#) to request copies of 18 U.S.C. § 208(b)(1) waivers from the employee’s home agency.
- Ethics pledge waivers under Executive Order 13770 are available [here](#).

Because of the special access provisions for obtaining financial disclosure reports, ethics agreements, CDs, and conflict of interest waivers, and ethics pledge waivers, we are not processing these records under the FOIA.

If you have any questions or wish to discuss any aspect of your request, you may contact me by telephone at 202-482-9267. As OGE's FOIA Public Liaison, I am available for assisting in reducing delays, increasing transparency and understanding of the status of requests, and assisting in the resolution of disputes. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

The OGE official responsible for this FOIA determination is the undersigned. In accordance with the FOIA, as codified at 5 U.S.C. § 552(a)(6)(A), and OGE's updated FOIA regulations, at 5 C.F.R. § 2604.304, you may administratively appeal this determination to the Program Counsel, U.S. Office of Government Ethics, 1201 New York Avenue, N.W., Suite 500, Washington, DC 20005-3917. Any such appeal must be in writing and must be sent within 90 days of the date you receive this response letter. If you do appeal, you should include copies of your request and this response, together with a statement of why you believe this initial determination is in error. Also, if you appeal, you should clearly indicate on the envelope and in the letter that it is a "Freedom of Information Act Appeal."

Sincerely,

Rachel K. Dowell
OGE FOIA Officer

Attachment

From: Rachel K. Dowell [mailto:rkdownell@oge.gov]
Sent: Thursday, December 15, 2016 2:54 PM
To: McIntyre-Barnes, Marilyn E.
Subject: FW: Nominee Report

From: Rachel K. Dowell
Sent: Thursday, December 15, 2016 2:52 PM
To: (b)(6) - Marilyn Barnes's email address
Cc: (b)(6) - Robert Garwera's email address; Teresa L. Williamson
Subject: Nominee Report

No attachment found in search

Hi Marilyn,

My initial questions/edits are included below (I'm also attaching examples of what to report and where, which may help in confirming that the report captures all reportable items). Let me know if you'd like to discuss any of these comments. As for the conflicts analysis, let's set up a time to discuss after you've had a chance to review.

A couple of administrative items: In case I'm ever out of the office during this review process, my backup is Patrick Lightfoot, 202-482-9271. Also, if you are having any issues on your end (e.g., responsiveness of filer, complicated conflicts analysis, complex assets, etc.), please let me know ASAP so that I can set expectations with the Transition Team and help keep this report moving.

Thanks!

Rachel

--

Rachel K. Dowell
Assistant Counsel
Office of Government Ethics
General Counsel & Legal Policy Division
Ethics Law and Policy Branch
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Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

(b) (5)

[REDACTED]

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From: [Deborah J. Bortot](#)
To: (b)(6) - Robert Gangwere's email address
Cc: [Rachel K. Dowell](#)
Subject: Linda McMahon
Date: Wednesday, December 28, 2016 3:58:14 PM

Robert,

Rachel Dowell provided comments on this report 12/15/16. None of the comments have been addressed in *Integrity*. As you know, this report is a top priority. Is there anything we can do to move this report along?

Thanks,
Deb

Deborah J. Bortot
Chief, Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9227
Facsimile: (202) 482-9237

From: [Emory A. Rounds III](#)
To: [Rachel K. Dowell](#)
Subject: FW: POC for McMahon
Date: Friday, December 30, 2016 10:43:56 AM

FYI...

From: Cooper Smith (b) (6)
Sent: Friday, December 30, 2016 10:43 AM
To: Emory A. Rounds III
Subject: POC for McMahon

Hey Emory-

To contact Ms. McMahon, first try her personal cell (b) (6), and if she doesn't answer that you can call her assistant Donna at (b) (6)

Coop

Referral to SBA



Referral to SBA



Referral to SBA

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Tuesday, January 03, 2017 3:39 PM
To: Gangwere, Robert L.
Cc: Rachel K. Dowell
Subject: RE: McMahon 278e

Robert,

Below are the links to the two legal advisories we have re: (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I will update Rachel on the other aspects of the call first thing tomorrow morning. Thanks!

--Patrick

Referral to SBA

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Tuesday, January 03, 2017 10:54 AM
To: Gangwere, Robert L.
Cc: Sandra S. Mabry; Rachel K. Dowell
Subject: RE: McMahon 278e

Hi Robert,

I'm Rachel's backup for nominee reports while she is out of the office today. Sandy Mabry and I would like to participate in the call this afternoon to help expedite things. What time were you planning to touch base with Ms. McMahon?

Sincerely,

--

Patrick J. Lightfoot
Assistant Counsel, Ethics Law & Policy Branch
General Counsel & Legal Policy Division

U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500
Washington, DC 20005
Telephone: (202) 482-9271

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Referral to SBA



From: Rachel K. Dowell [<mailto:rkdownell@oge.gov>]
Sent: Friday, December 30, 2016 9:46 AM
To: Gangwere, Robert L.
Subject: FW: POC for McMahon

Here you go! Let me know once you have made contact/sent questions over to either her or whoever she identifies as her representative.

Rest of chain mentioned above



Referral to SBA



Referral to SBA

From: Lattner, Paul H. (b) (6)
Sent: Friday, January 06, 2017 1:07 PM
To: Gangwere, Robert L.
Cc: McIntyre-Barnes, Marilyn E.
Subject: RE: 278e -- Final questions and corrections

4 page attachment withheld in full - (b)(3), (4), (5), (6)

Robert,

Attached are responses to yesterday's questions, see text in italics.

K&L GATES

Paul H. Lattner
Tax Manager
K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613

(b) (6)

D (b) (6)

F 412-355-6501

Referral to SBA

Referral to SBA



From: [Rachel K. Dowell](#)
To: ["Gangwere, Robert L."; Sundberg, Susan L.; McIntyre-Barnes, Marilyn E.](#)
Subject: RE: Add'l questions
Date: Tuesday, January 10, 2017 10:55:35 AM
Attachments: [Draft EA - McMahon - 1.10.17.docx](#)

3 page attachment withheld in full - (b)(3), (4), (5), (6)

Hi all,

Please find attached my edits to the Ethics Agreement (EA) based on the most recent version of the 278. It has not been cleared yet, so please do not share this draft with the nominee. Please provide me with any edits or corrections you have to the EA, and I will move that forward for clearance.

With regard to the 278 (and related issues that I need for my notes), I think we are very close! Here are my pending questions/edits. Please let me know when the form has been updated and send back answers as soon as possible.

(b)(3), (5), (6)

(b)(3), (5), (6)



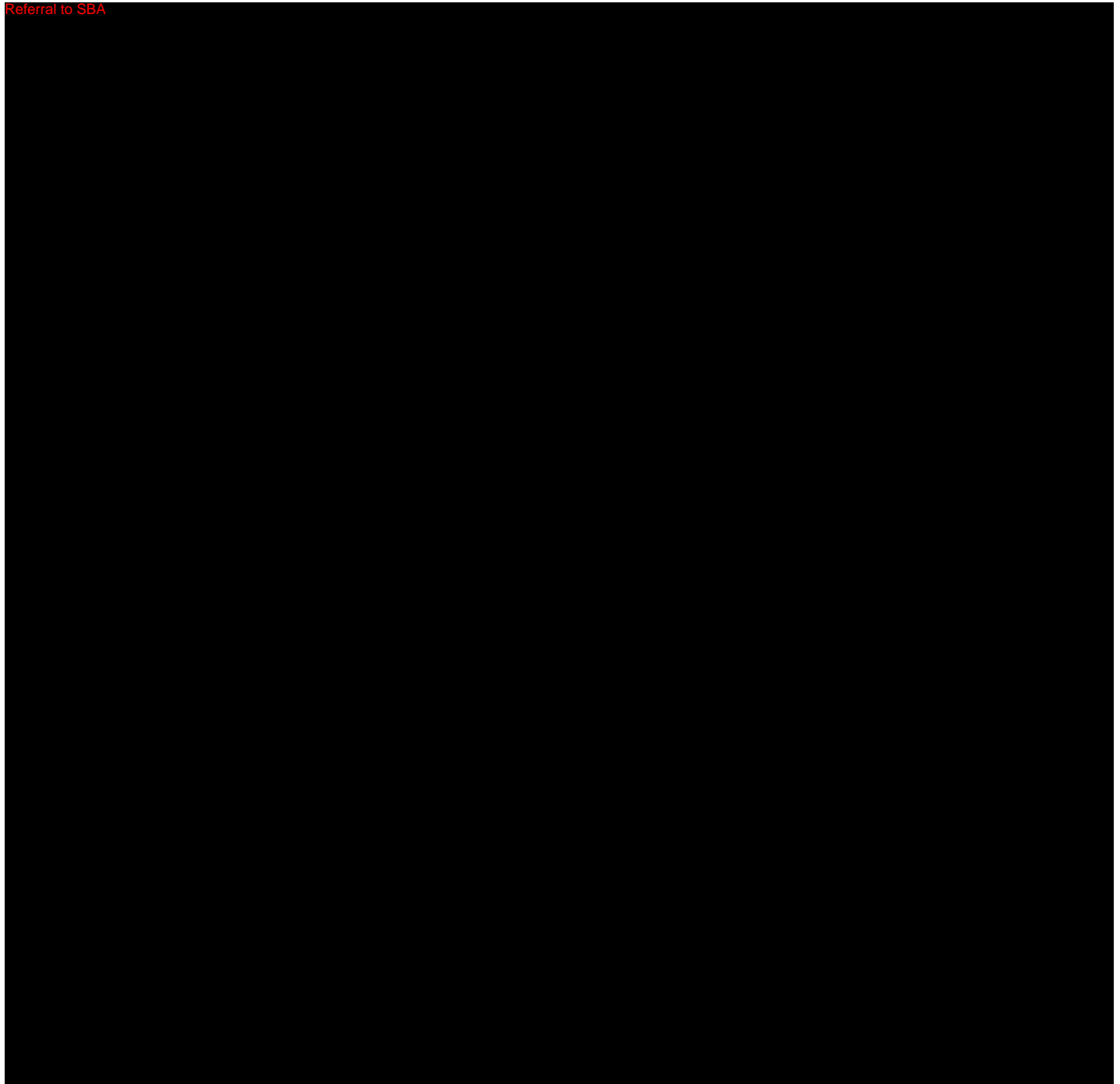
Thanks!
Rachel

--

Rachel K. Dowell
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Referral to SBA



Referral to SBA



From: Lattner, Paul H. (b) (6)
Sent: Friday, January 06, 2017 4:19 PM
To: Gangwere, Robert L.
Subject: re: Add'l questions

Robert,

(b) (3), (4), (5), (6)



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Paul H. Lattner
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210 Sixth Avenue
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D (b) (6)

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From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#)
Cc: [Sundberg, Susan L.](#); [McIntyre-Barnes, Marilyn E.](#); [Gangwere, Robert L.](#)
Subject: RE: Add'l questions
Date: Tuesday, January 10, 2017 2:24:58 PM

Rachel,

I've made the requested changes to Form 278.

(b)(3), (5), (6)



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(b) (6)

D

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Rest of chain mentioned above



AMERICAN
OVERSIGHT

-17-0005-J-000017

From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#)
Subject: RE: Update
Date: Thursday, January 12, 2017 12:48:41 PM

Rachel,

(b)(3), (5), (6)



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From: Rachel K. Dowell [mailto:rkdowell@oge.gov]
Sent: Thursday, January 12, 2017 11:04 AM
To: Lattner, Paul H.
Subject: RE: Update

(b)(3), (4), (5), (6)



From: Lattner, Paul H. (b)(6)
Sent: Thursday, January 12, 2017 10:11 AM

To: Rachel K. Dowell; Sundberg, Susan L.; McIntyre-Barnes, Marilyn E.
Cc: Gangwere, Robert L.
Subject: RE: Update

To all,

Per our discussion yesterday, I've made the following changes to Form 278:

(b)(3), (5), (6)



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(b) (6)

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(b) (6)

-4

From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#); [Sundberg, Susan L.](#) (b) (6); [McIntyre-Barnes, Marilyn E.](#)
Cc: [Mooney, Scott E.](#)
Subject: Re: (b) (3), (b) (6)
Date: Thursday, January 12, 2017 1:31:43 PM

(b) (3), (4), (5), (6)

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From: [Mooney, Scott E.](#)
To: [Rachel K. Dowell](#)
Subject: RE: mcMahon letter
Date: Thursday, January 12, 2017 3:55:48 PM

You're welcome. Thank you for the quick response. We'll send to Linda's assistant, Donna Letizia, right away.

We will request that Donna email a pdf of the signed letter to you as soon as the letter is signed. We understand that they will be able to sign today, but we don't know when.



Scott E. Mooney

K&L Gates LLP

K&L Gates Center

210 Sixth Avenue

Pittsburgh, PA 15222

Phone: (b) (6)

Fax: 412-355-6501

(b) (6)

www.klgates.com

From: Rachel K. Dowell [mailto:rkdowell@oge.gov]

Sent: Thursday, January 12, 2017 3:53 PM

To: Mooney, Scott E.

Subject: RE: mcMahon letter

Thank you! That's exactly what we were looking for. You can send for signature.

From: Mooney, Scott E. (b) (6)
Sent: Thursday, January 12, 2017 3:06 PM
To: Rachel K. Dowell
Subject: RE: mcmahon letter

Hello, Rachel.

1 page attachment withheld in full - (b)(3), (4), (5), (6)

Attached is your requested draft letter from the McMahons re (b)(3), (6). Please let me know if you'd like to discuss further or when I should send to the McMahons for signature.

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Scott E. Mooney

K&L Gates LLP

K&L Gates Center

210 Sixth Avenue

Pittsburgh, PA 15222

Phone: (b) (6)

Fax: 412-355-6501

(b) (6)

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From: Rachel K. Dowell [<mailto:rkdowell@oge.gov>]
Sent: Thursday, January 12, 2017 1:43 PM
To: Mooney, Scott E.
Subject: RE: mcmahon letter

Hi Scott,

(b)(3), (5), (6)

Thanks!
Rachel

--

Rachel K. Dowell
Assistant Counsel
Office of Government Ethics
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Ethics Law and Policy Branch
(202) 482-9267

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From: Mooney, Scott E. (b) (6)
Sent: Thursday, January 12, 2017 1:41 PM
To: Rachel K. Dowell
Subject: mcmahon letter

Rachel,

We are proceeding with the draft letter that you requested. Could you confirm that it should
(b)(3), (5), (6) ?



Scott E. Mooney

K&L Gates LLP

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Fax: 412-355-6501

(b) (6)

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From: [Mooney, Scott E.](#)
To: [Rachel K. Dowell](#)
Subject: status of letter
Date: Thursday, January 12, 2017 4:45:49 PM

Hello, again.

I just received word that it is likely that you will not be receiving a copy of the signed (b)(3), (6) letter until tomorrow morning (due to Linda's schedule of meetings tonight).

Do you have any sense for how long it will take for OGE to circulate the conflicts letter for Linda's signature once you receive a copy of the signed (b)(3), (6) letter?



Scott E. Mooney

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(b)(6)

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From: [Donna Letizia](#)
To: ["McDevitt, Jerry"](#); [Rachel K. Dowell](#)
Cc: [PAUL LATTNER](#); ["Mooney, Scott E."](#)
Subject: Linda E. McMahon (b)(3), (6); Linda E. McMahon (b)(3), (6)
Date: Thursday, January 12, 2017 7:23:20 PM
Attachments: [Linda McMahon.pdf](#) 2 page attachment withheld in full - (b)(3), (4), (5), (6)
[Vincent McMahon.pdf](#)

As requested, the attached letters are signed by Linda and Vincent McMahon.

From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#)
Subject: re: Q2
Date: Friday, January 13, 2017 1:23:36 PM

Rachel,

(b)(3), (5), (6)



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(b) (6)



D

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From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#)
Cc: [Mooney, Scott E.](#)
Subject: re:
Date: Friday, January 13, 2017 2:54:17 PM

Rachel,

I've updated the position in Part 1, Line 6 for (b)(3), (b)

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Paul H. Lattner
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From: [Rachel K. Dowell](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: FW: EA and follow-up questions
Date: Friday, January 13, 2017 8:27:22 PM
Attachments: [EA for preclearance \(McMahon, 1.13.17\).docx](#)
[Notes for preclearance \(McMahon, 1.13.17\).docx](#)
[Linda McMahon.pdf](#)
[Vincent McMahon.pdf](#)

12 page attachment withheld in full - (b)(3), (4), (5), (6)

Hi Deb & Heather,

All follow-up edits to Ms. McMahon's report have now been made in Integrity. EA, notes, and letters to the (b)(3), (b)(6) are attached (hard copies with the folder). Please let me know if you need anything else. I am out on Tuesday but will be checking my email and my phone will forward to my cell.

Thanks!
Rachel

From: Shum, Kitty (b)(6)
Sent: Friday, January 13, 2017 6:07 PM
To: Rachel K. Dowell
Cc: Paul H. Lattner (b)(6); (b)(6) - Robert Gangwere's email address; (b)(6) - Susan Sundberg's email address; (b)(6) - Marilynne Barrie's email address
Subject: RE: EA and follow-up questions

Rachel,

As per our conversations today, please note that the following have been amended/corrected as requested.

Item # 2- information requested has been added.

Item # 3- After your clarification, we have made the necessary adjustments for previous entries.

(b)(3), (5), (6)

Please let me know if you have any further questions or concerns.

If you need to reach me, please contact my personal cell phone at (b)(6)

Regards,

Kitty Shum

Sr. Reg'd Service Associate
Morgan Stanley Wealth Management
1290 Avenue of the Americas
New York, NY 10104
Phone: (b) (6)
Fax: 212-705-4556

From: Rachel K. Dowell [<mailto:rkdownell@oge.gov>]
Sent: Thursday, January 12, 2017 5:54 PM
To: 'Gangwere, Robert L.'; Sundberg, Susan L.; McIntyre-Barnes, Marilyn E.
Cc: Mooney, Scott E.; Lattner, Paul H.
Subject: EA and follow-up questions

Hi everyone,

At this point, we can share the Ethics Agreement with Ms. McMahon, but she should not sign it yet and it is subject to change once our Director reviews it (hopefully tomorrow, pending the answers of a few follow-up questions below). Ms. McMahon is also expected to sign the attached statement shortly re: (b)(3), (6).

Upon review, we had a few very minor follow-up questions/edits that can hopefully be addressed tomorrow morning:

(b)(3), (5), (6)



Once I have answers to the follow-up questions, I will continue moving this report forward.

Thanks all!
Rachel

--

Rachel K. Dowell
Assistant Counsel
Office of Government Ethics
General Counsel & Legal Policy Division
Ethics Law and Policy Branch
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From: [Deborah J. Bortot](#)
To: [Heather A. Jones](#); (b)(6) - Susan Sundberg's email address; (b)(6) - Marilynne Barnes's email address; (b)(6) - Robert Gangwere's email address
Cc: [Rachel K. Dowell](#); [David J. Apol](#)
Subject: RE: McMahon - Can someone give me a call about a conflicts question?
Date: Saturday, January 14, 2017 1:02:13 PM

Robert, Susan, Marilynne,

(b)(3), (5), (6)

Thanks,
Deb

From: Heather A. Jones
Sent: Saturday, January 14, 2017 11:03 AM
To: (b)(6) - Susan Sundberg's email address; (b)(6) - Marilynne Barnes's email address; (b)(6) - Robert Gangwere's email address
Cc: Deborah J. Bortot; Rachel K. Dowell
Subject: McMahon - Can someone give me a call about a conflicts question?

I have a question about one of the assets that was added yesterday. You can reach me at

(b)(6)

Also I have the following notes on the report, all on Part 6:

(b)(3), (5), (6)

Please let me know if you have any questions.

Thanks,
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: [Emory A. Rounds III](#)
To: ["James Carroll"](#)
Subject: RE: McMahon
Date: Monday, January 16, 2017 1:38:06 PM

Rachel Dowell @ 202-482-9267, but if she is not in today – the holiday – maybe Deb Bortot @ 202-482-9227 . . .

From: James Carroll (b) (6)
Sent: Monday, January 16, 2017 1:36 PM
To: Emory A. Rounds III
Subject: McMahon

Do you know who is her OGE contact? They are trying to reach him/her

From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#); [Heather A. Jones](#); [Deborah J. Bortot](#); "Shum, Kitty"; (b)(6) - Robert Gangwere's email address
(b)(6) - Susan Sundberg's email address (b)(6) - Marilyn Barnes's email address
Subject: RE: McMahon - A couple of questions
Date: Monday, January 16, 2017 3:52:35 PM

Rachel,

I reviewed the changes and they are correct.

K&L GATES

Paul H. Lattner
Tax Manager
K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613
(b)(6)
D (b)(6)
F 412-355-6501

From: Rachel K. Dowell [mailto:rkdowell@oge.gov]
Sent: Monday, January 16, 2017 3:30 PM
To: [Heather A. Jones](#); [Deborah J. Bortot](#); [Lattner, Paul H.](#); "Shum, Kitty";
(b)(6) - Robert Gangwere's email address (b)(6) - Susan Sundberg's email address (b)(6) - Marilyn Barnes's email address
Subject: FW: McMahon - A couple of questions

Hi everyone,

Please see the answers in red below. I made the changes in Integrity per Paul's instructions, and he is going to confirm by replying to this email that my corrections are correct. (b)(3), (5), (6)

[REDACTED]

Thanks,

Rachel

From: Heather A. Jones

Sent: Sunday, January 15, 2017 11:15 AM

To:

(b)(6) - Paul Latner's email address

(b)(6) - Kitty Shum's email address

Cc:

(b)(6) - Robert Gangwere's email address

(b)(6) - Susan Sundberg's email address

(b)(6) - Marilyn Barnes's email address

Deborah J. Bortot; Rachel K. Dowell

Subject: McMahon - A couple of questions

Hello-

I have been working with Rachel on Ms. McMahon's report. We have a few outstanding items on the report after the changes on Friday and one question.

(b)(3), (5), (6)

The notes on the report all relate to Part 6.

(b)(3), (5), (6)

Please let me know if you have any questions and thanks so much for your assistance,
Heather

Heather Jones

Senior Counsel

U.S. Office of Government Ethics

(202) 482-9316

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From: [Heather A. Jones](#)
To: ["Ann M. Donaldson"](#)
Cc: [Deborah J. Bortot](#); [David J. Apol](#); [Director of OGE](#); [Sandra S. Mabry](#); [Rodrick T. Johnson](#); [Teresa L. Williamson](#); [Emory A. Rounds III](#); [Rachel K. Dowell](#); (b)(6) - Robert Gangwere's email address; (b)(6) - Susan Sunberg's email address; (b)(6) - Marynne Barnes's email address
Subject: Preclearance: Linda McMahon
Date: Monday, January 16, 2017 5:12:01 PM
Attachments: [Revised final ethics agreement.docx](#)

Annie, [Linda McMahon](#) is precleared. I have attached the ethics agreement.

Thanks!
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: [@OfficeGovEthics](#)

From: [Rachel K. Dowell](#)
To: [Heather A. Jones](#)
Subject: RE: Preclearance: Linda McMahon
Date: Monday, January 16, 2017 5:25:55 PM

Can you give me a call when you have a chance? (b) (6). Thanks!

From: Heather A. Jones
Sent: Monday, January 16, 2017 5:12 PM
To: 'Ann M Donaldson'
Cc: Deborah J. Bortot; David J. Apol; Director of OGE; Sandra S. Mabry; Rodrick T. Johnson; Teresa L. Williamson; Emory A. Rounds III; Rachel K. Dowell; (b) (6) - Robert Gangwere's email address; (b) (6) - Susan Sundberg's email address; (b) (6) - Marlyne Barnes's email address;
Subject: Preclearance: Linda McMahon

2 page attachment withheld in full - (b)(3), (4), (5), (6)

Annie, [Linda McMahon](#) is precleared. I have attached the ethics agreement.

Thanks!
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

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Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

From: [Deborah J. Bortot](#)
To: (b)(6) - Robert Gangwere's email address
Subject: McMahon Ethics Agreement
Date: Monday, January 16, 2017 6:49:06 PM
Attachments: [Revised final ethics agreement.docx](#)

2 page attachment withheld in full - (b)(3), (4), (5), (6)

See attached

From: [Director of OGE](#)
To: [Rachel K. Dowell](#); [Director of OGE](#); [Deborah J. Bortot](#); [David J. Apol](#); [Heather A. Jones](#)
Subject: RE: need some action from nominee
Date: Monday, January 16, 2017 8:15:25 PM

Just tell her to have it to us any time tonight or early tomorrow morning. We'll send it to the Senate by 10:00 a.m. There's no over there anyway.

Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917

Telephone: 202.482.9292
Email: walter.shaub@oge.gov

From: Rachel K. Dowell
Sent: Monday, January 16, 2017 7:31 PM
To: Director of OGE; Deborah J. Bortot; David J. Apol; Heather A. Jones
Subject: RE: need some action from nominee

The nominee's personal assistant is trying to get ahold of the nominee but has not made contact yet. She is asking when the cut-off point is for us to send the documents over tonight – what should I tell her?

From: Rachel K. Dowell
Sent: Monday, January 16, 2017 7:08 PM
To: Director of OGE; Deborah J. Bortot; David J. Apol
Subject: RE: need some action from nominee

Sent the EA to filer and her assistant; assistant is heading back into the office to make sure this gets signed right away and to wait for the green light to submit in Integrity. I will send the signed EA as soon as I have it.

From: Director of OGE
Sent: Monday, January 16, 2017 7:01 PM
To: Rachel K. Dowell; Director of OGE; Deborah J. Bortot; David J. Apol
Subject: RE: need some action from nominee

[Looping in Dave](#)

From: Rachel K. Dowell
Sent: Monday, January 16, 2017 6:54 PM
To: Director of OGE; Deborah J. Bortot
Subject: RE: need some action from nominee

Yes, calling her personal assistant now.

From: Director of OGE
Sent: Monday, January 16, 2017 6:52 PM
To: Rachel K. Dowell; Deborah J. Bortot; Director of OGE
Subject: need some action from nominee

No attachment found in search

Rachel, I have spoken to Robert Gangwere. He's heading into his office now.

Can you contact the nominee's representatives and have them ask her to sign the ethics agreement and email a scanned copy ASAP. We need it right away if we're going to get this to the Senate tonight. A clean copy is attached. (Also, ask them to give you an estimate on how long it will take to get the signed EA back to us.)

(But tell them not to have her sign the 278 in Integrity until we let them know we have the green light from PTT.)

Thanks

From: [Deborah J. Bortot](#)
To: [Teresa L. Williamson](#); [Gangwere, Robert L.](#); [Sandra S. Mabry](#); [Heather A. Jones](#); [Rachel K. Dowell](#)
Subject: Fw: Mrs. Linda McMahon
Date: Tuesday, January 17, 2017 6:56:05 AM

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Ann M Donaldson (b) (6)
Sent: Monday, January 16, 2017 11:11 PM
To: Deborah J. Bortot; Heather A. Jones
Subject: Mrs. Linda McMahon

On behalf of the President-Elect, this email serves as confirmation that the President-Elect intends to nominate Mrs. Linda McMahon to be Administrator of the Small Business Administration. Please transmit herpre-cleared 278 report to the appropriate Senate committee.

Ann M. Donaldson
Associate
[JONES DAY® - One Firm WorldwideSM](#)
51 Louisiana Avenue, NW
Washington, DC 20001
Office +1 (b) (6)

=====

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=====

From: [Deborah J. Bortot](#)
To: [Rachel K. Dowell](#); [Teresa L. Williamson](#); [b](6) - Robert Gangwere's email address
Subject: RE: Ethics Agreement - McMahon
Date: Tuesday, January 17, 2017 8:32:02 AM

Thanks

From: Rachel K. Dowell
Sent: Tuesday, January 17, 2017 8:26 AM
To: Teresa L. Williamson; Deborah J. Bortot; [b](6) - Robert Gangwere's email address
Subject: Ethics Agreement - McMahon
Importance: High

Attachment released below

Signed ethics agreement attached. I have reached out to the filer/her rep to submit in Integrity.

Robert: Once she submits, please certify and send us your signed transmittal letter.

From: [Donna Letizia](#)
To: [Rachel K. Dowell](#)
Cc: [Linda McMahon](#); (b)(6) - Robert Gangwere's email address
Subject: RE: Ethics Agreement for Senate Transmittal
Date: Tuesday, January 17, 2017 8:41:33 AM

Final version submitted.

From: Rachel K. Dowell [mailto:rkdowell@oge.gov]
Sent: Tuesday, January 17, 2017 8:22 AM
To: 'Donna Letizia' <(b)(6)>
Cc: Linda McMahon <(b)(6)>
Subject: RE: Ethics Agreement for Senate Transmittal

Thank you!

At this point, Ms. McMahon may now submit the final version of the OGE 287e in Integrity.

From: Donna Letizia <(b)(6)>
Sent: Tuesday, January 17, 2017 8:01 AM
To: Rachel K. Dowell
Cc: Linda McMahon
Subject: RE: Ethics Agreement for Senate Transmittal
Importance: High

Attachment released below

Hi Kimberly,

As requested, attached is the signed Ethics Agreement. Please advise when to submit the final version of the OGE 278e.

Thank you,

Donna

From: Rachel K. Dowell [mailto:rkdowell@oge.gov]
Sent: Monday, January 16, 2017 7:09 PM

To: (b)(6) - Donna Letizia's email address
Subject: FW: Ethics Agreement for Senate Transmittal

Hi Donna – Please let me know once you have a sense of timing for signature.

Also, as soon as we get the go-ahead from the transition team, I will alert you to submit a final version of the OGE 278e, public financial disclosure report.

Thanks again!

From: Rachel K. Dowell
Sent: Monday, January 16, 2017 7:07 PM
To: (b)(6) - McMahon's email address
Cc: (b)(6) - Donna Letizia's email address
Subject: Ethics Agreement for Senate Transmittal

No attachment found in search

Good evening,

Please sign the attached ethics agreement and email a scanned copy back to me as soon as possible.

If you have any questions, please feel free to contact me at (b) (6).

Thank you in advance,

Rachel Dowell

--

Rachel K. Dowell

Assistant Counsel

Office of Government Ethics

General Counsel & Legal Policy Division

Ethics Law and Policy Branch

(202) 482-9267

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From: [Heather A. Jones](#)
To: [Sandra S. Mabry](#)
Subject: Can you please move the McMahon docs to signature?
Date: Tuesday, January 17, 2017 10:32:01 AM

Both Rachel and her backup are out

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: [Rachel K. Dowell](#)
To: [Deborah J. Bortot](#)
Cc: [Sandra S. Mabry](#); [Teresa L. Williamson](#)
Subject: RE: McMahon Certification Letter
Date: Tuesday, January 17, 2017 10:41:11 AM

Thank you

From: Deborah J. Bortot
Sent: Tuesday, January 17, 2017 10:40 AM
To: Rachel K. Dowell
Cc: Sandra S. Mabry; Teresa L. Williamson
Subject: RE: McMahon Certification Letter

Rachel,

Patrick is out, so we are having Sandy move the paperwork unless you already have someone else doing it.

Thanks,
Deb

From: Rachel K. Dowell
Sent: Tuesday, January 17, 2017 10:26 AM
To: Teresa L. Williamson
Cc: Deborah J. Bortot; Heather A. Jones
Subject: FW: McMahon Certification Letter

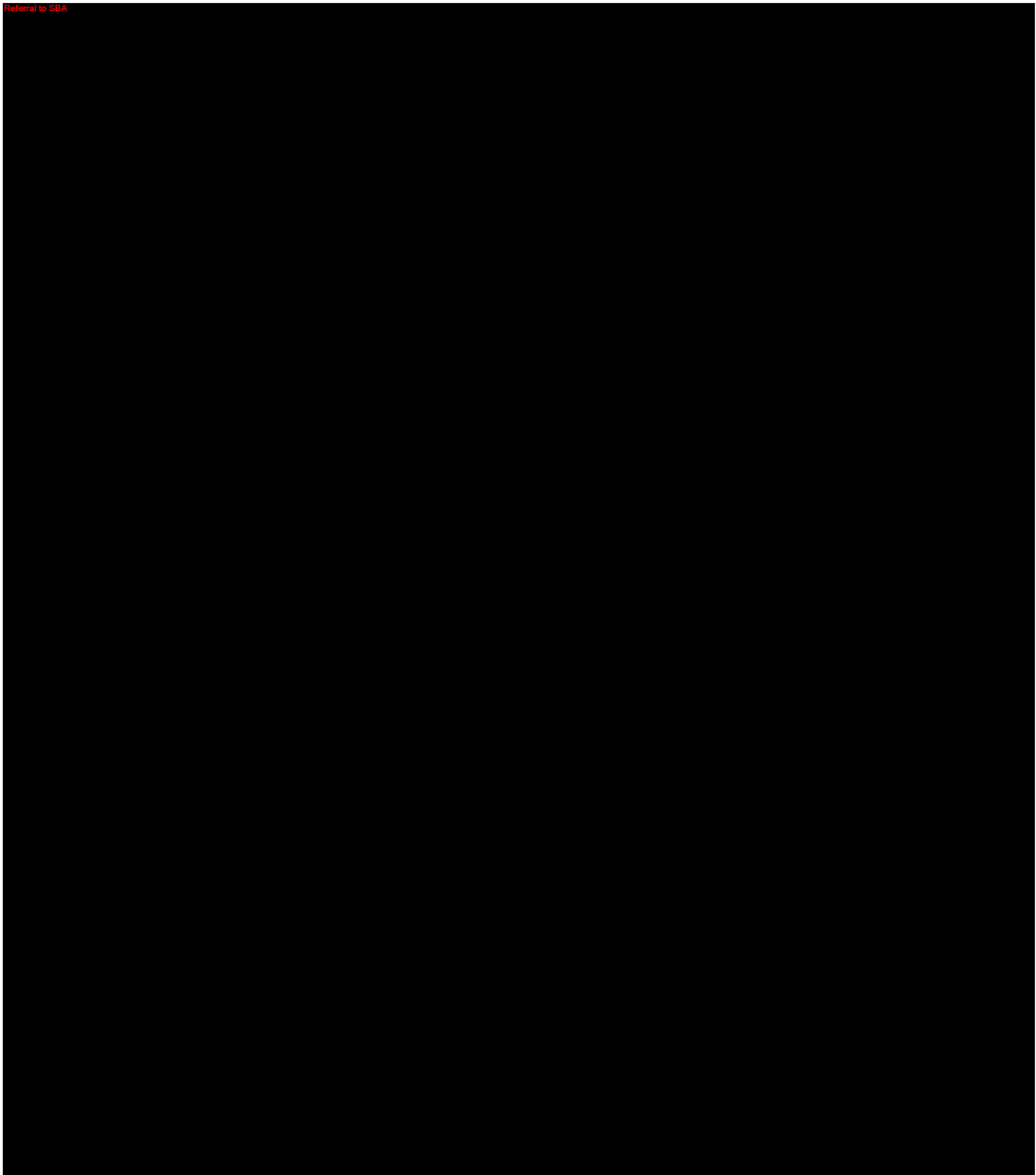
Attachments released below

A black rectangular redaction box covering the email attachments.

Referral to SBA

A large black rectangular redaction box covering the majority of the email body content.

[REDACTED]



From: [Integrity.gov](https://integrity.gov)
To: [Sandra S. Mabry](#)
Subject: Integrity.gov: Report Pending Action
Date: Tuesday, January 17, 2017 10:56:46 AM

A 2017 Nominee report for McMahon, Linda E is pending your action as OGE Nominee Program Manager. You may access the report by logging into integrity at <https://integrity.gov>.

From: [Sandra S. Mabry](#)
To: [Teresa L. Williamson](#)
Subject: RE: reports on website
Date: Tuesday, January 17, 2017 3:27:39 PM

Booo ... rain doesn't help, either

From: Teresa L. Williamson
Sent: Tuesday, January 17, 2017 2:48 PM
To: Sandra S. Mabry
Subject: RE: reports on website

No. still waiting. I'll probably get stuck in all the traffic at this point – yeah!

From: Sandra S. Mabry
Sent: Tuesday, January 17, 2017 2:47 PM
To: Teresa L. Williamson
Subject: RE: reports on website

Thanks.



From: Teresa L. Williamson
Sent: Tuesday, January 17, 2017 2:46 PM
To: Sandra S. Mabry
Subject: RE: reports on website

Yes – checked this morning and nothing – still nothing.

From: Sandra S. Mabry
Sent: Tuesday, January 17, 2017 2:45 PM
To: Teresa L. Williamson
Subject: RE: reports on website

Thanks, Teresa. Did you check Senate website for nominations? President Obama announced his intent to nominate Jason Kearns (US International Trade Commission—on WHO website.

From: Teresa L. Williamson
Sent: Tuesday, January 17, 2017 2:43 PM
To: Vincent Salamone
Cc: Deborah J. Bortot; Heather A. Jones; Sandra S. Mabry
Subject: reports on website

FYI. Mulvaney, Ross, McMahon have been added to the website.

From: [Shelley K. Finlayson](#)
To: [Teresa L. Williamson](#); [Sandra S. Mabry](#); [Heather A. Jones](#)
Subject: RE: call from committee
Date: Wednesday, January 18, 2017 4:16:51 PM

Liz is calling her back

From: Teresa L. Williamson
Sent: Wednesday, January 18, 2017 2:51 PM
To: Sandra S. Mabry; Shelley K. Finlayson; Heather A. Jones
Subject: RE: call from committee

She left me the message at 2:26pm if that helps.

From: Sandra S. Mabry
Sent: Wednesday, January 18, 2017 2:48 PM
To: Shelley K. Finlayson; Heather A. Jones; Teresa L. Williamson
Subject: RE: call from committee

I don't know. She called Heather directly about release of the report. Heather "showed" her where it is on our website.

From: Shelley K. Finlayson
Sent: Wednesday, January 18, 2017 2:45 PM
To: Heather A. Jones; Teresa L. Williamson; Sandra S. Mabry
Subject: RE: call from committee

Is this the same request Rachel received? If so, it was assigned to Liz Horton earlier today.

From: Heather A. Jones
Sent: Wednesday, January 18, 2017 2:32 PM
To: Teresa L. Williamson; Sandra S. Mabry; Shelley K. Finlayson
Subject: RE: call from committee

Please see below.

From: Teresa L. Williamson
Sent: Wednesday, January 18, 2017 2:31 PM
To: Sandra S. Mabry
Cc: Heather A. Jones
Subject: call from committee

Sandy, Would you please call Kaylyn from Senator Risch's office (Committee on Small Business & Entrepreneurship) Her number is (b) (6) She left me a voice mail message saying she has a question on Ms. McMahon's financial disclosure form.

Thanks
Teresa

From: [Teresa L. Williamson](#)
To: [Rachel K. Dowell](#); (b)(6) - Robert Gangwere's email address
Subject: Public Financial Disclosure Report of Linda E. McMahon
Date: Tuesday, January 31, 2017 11:13:17 AM
Attachments: [McMahon, Linda E. final278.pdf](#)
[McMahon, Linda E. finalsenateltr.pdf](#)
[McMahon, Linda E. finalEA.pdf](#)

Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Good Morning,

I wanted to make sure that you received a copy of the nomination package that was sent to the Senate committee January 17, if you didn't already receive a copy.

Thank you.
Teresa

From: Teresa L. Williamson
Sent: Tuesday, January 17, 2017 12:03 PM
To: (b)(6) - Kathryn Eden's email address
Subject: Public Financial Disclosure Report of Linda E. McMahon

Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Good Afternoon,

I've attached the financial disclosure package for Linda E. McMahon. President-Elect Trump has announced his intention to nominate Ms. McMahon for the position of Administrator, Small Business Administration.

Thanks!

Teresa Williamson
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9283

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



January 17, 2017

The Honorable James E. Risch
Chairman
Committee on Small Business
and Entrepreneurship
United States Senate
Washington, DC 20510

Dear Mr. Chairman:


In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Linda E. McMahon. President-Elect Trump has announced his intention to nominate Ms. McMahon for the position of Administrator, Small Business Administration.

We have reviewed the report and have obtained advice from the agency concerning any possible conflict in light of its functions and the nominee's proposed duties. Also enclosed is an ethics agreement outlining the actions that the nominee will undertake to avoid conflicts of interest. Unless a date for compliance is indicated in the ethics agreement, the nominee must fully comply within three months of confirmation with any action specified in the ethics agreement.

Based thereon, we believe that this nominee is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,
**WALTER
SHAUB**

Walter M. Shaub, Jr.
Director

 Digitally signed by WALTER SHAUB
DN c=US, o=U.S. Government, ou=Office of
Government Ethics, cn=WALTER SHAUB,
0.9.2342.19200300.100.1.1=95491000364655
Date 2017.01.17 11 43 29 -05 00'

Enclosures



January 16, 2017

Robert L. Gangwere, Esq.
Designated Agency Ethics Official
U.S. Small Business Administration
1000 Walnut Street, Suite 530
Kansas City, MO 64106

Dear Mr. Gangwere:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Administrator of the U.S. Small Business Administration (SBA).

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Within 90 days of my confirmation, I will divest my interests in the following entities: HPD Alkeon Growth Partners Fund, LP; and Skybridge Multi-Advisor Fund Portfolios, LLC – Series G. With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested them, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

Within 180 days of my confirmation, I will divest my interests in HPD Millennium Strategic Capital Fund, LP. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

Upon confirmation, I will resign from my positions with the following entities: Vincent & Linda McMahon Family Foundation; APCO Worldwide of Washington, D.C.; Sacred Heart University of Fairfield, CT; Close Up Foundation of Washington, D.C.; American Corporate Partners, Inc. of New York City, NY; and Family Trust 6. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that these entities are a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my positions as managing member of the following entities: McMahon Ventures, LLC; and Women's Leadership LIVE, LLC. I will become a non-managing member of each entity. During my appointment, I will not manage these entities or provide any other services to them. Instead, I will receive only passive investment income from them. As Administrator, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of these entities, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I will retain my positions with the following revocable trusts: Family Trust 8; Family Trust 9A; and Family Trust 9B. I will not receive any fees for the services that I provide as an Investment Direction and Distribution Advisor during my appointment to the position of Administrator. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of these entities, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

My spouse is employed by and has an equity interest in World Wrestling Entertainment, Inc. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of World Wrestling Entertainment, Inc., unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in black ink, reading "Linda E. McMahon". The signature is fluid and cursive, with the first name "Linda" and last name "McMahon" clearly distinguishable.

Linda E. McMahon

From: [Lorna A. Syme](#)
To: (b)(6) - Elizabeth Horton's email address
Subject: draft nominee report
Date: Friday, December 16, 2016 4:38:45 PM

Hi Beth:

Per my voicemail, if the filer's representative is willing to share a preview draft of the report with us, you can email it to me at lasyme@oge.gov.

Thanks!

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

From: [Lorna A. Syme](#)
To: (b)(6) - Elizabeth Horton's email address
Cc: (b)(6) - Peter Riesen's email address
Subject: RE: Nominee report
Date: Tuesday, December 20, 2016 2:49:04 PM
Attachments: [initial comments Mnuchin.docx](#)

6 page attachment withheld in full - (b)(3), (4), (5), (6)

Beth:

Yes – that’s perfect! I’ll be here at 3:30 so call when you have the chance. 202-482-9277.

I just left a message for Peter. I figured you all were super busy with a million things going on. I promise I won’t take too long – I just want to provide some context for a few of the more significant comments.

I’ve attached my comments so we can look at them together.

Thanks!

Lorna

Referral to Treasury

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Tuesday, December 20, 2016 10:33 AM
To: Horton, Elizabeth
Cc: Riesen, Peter
Subject: RE: Nominee report

When would you be available to talk? I’m available all afternoon, so if you suggest a time that works for both of you that will work for me also. I can be reached on 202-482-9277.

Referral to Treasury

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Tuesday, December 20, 2016 9:44 AM
To: Horton, Elizabeth
Subject: Nominee report

Hi Beth:

I am the assigned reviewer for Mr. Mnuchin's report. I have reviewed the draft and should have my comments ready by early afternoon. I would like to discuss a few of my comments with the reviewer at Treasury. Will you be reviewing the report or is there someone else I should contact?

Thanks!

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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From: [Lorna A. Syme](#)
To: [Keith Labedz](#)
Subject: FW: STM
Date: Tuesday, December 20, 2016 4:21:56 PM
Attachments: [20161220095014.PDF](#)

4 page attachment withheld in full - (b)(3), (4), (5), (6)

Referral to Treasury

From: Rizzi, Robert (b) (6)
Sent: Tuesday, December 20, 2016 9:47 AM
To: Granat, Rochelle
Cc: Steven Mnuchin
Subject: STM

No attachment found in search

Rochelle –

Attached please find a "roadmap" memo, outlining our proposed approach to resolve any potential conflicts of interest with respect to the nomination of Stephen Mnuchin. The memo is still marked "draft," in the event changes are necessary, but covers the basic issues that we have already discussed. The cross references are to the 278e that has been submitted; please let us know if you need another copy. Also, please feel free to forward a copy of the memo to OGE, if you think that is appropriate.

We look forward to discussing this with you at your convenience.

Bob

From: [Lorna A. Syme](#)
To: (b)(6) - Elizabeth Horton's email address (b)(6) - Peter Riesen's email address
Subject: Mnuchin
Date: Wednesday, December 21, 2016 10:55:06 AM

Beth and Peter

Based on our conversation yesterday, would you please ask the filer's representative these questions:

(b)(3), (5), (6)



Also, please remind the filer's representative that if he needs to move items on the report, there is a "move asset" button in Integrity which makes it easy to move things around on the report.

Thanks!
Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE's website: www.oge.gov
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From: [Lorna A. Syme](#)
To: (b)(6) - Peter Riesen's email address
Subject: RE: Mnuchin
Date: Thursday, December 22, 2016 4:18:37 PM

Thanks!

Referral to Treasury

A large rectangular area of the email body is completely redacted with a solid black box.

Referral to Treasury

A large rectangular area of the email body is completely redacted with a solid black box.

From: [Deborah J. Bortot](#)
To: ["Rizzi, Robert"](#)
Cc: [Lorna A. Syme](#)
Subject: RE: STM
Date: Tuesday, December 27, 2016 12:23:05 PM

Bob,

The report shouldn't be locked. The nominee workflow is different from the annual workflow.

Thanks,
Deb

From: Rizzi, Robert (b) (6)
Sent: Tuesday, December 27, 2016 10:54 AM
To: Deborah J. Bortot
Cc: Mullis, Dianna
Subject: STM

Hi Deb –

Steven Mnuchin "submitted" his 278, but of course there are a number of questions on the form from Treasury and OGE. We are putting together a "grid" of responses and should have that to you by later today. Some of these will require getting back into the 278, and we have a few additional items as well. How do we go about "unlocking" the 278? Dianna is working on this with me.

Thanks very much.

From: [Keith Labedz](#)
To: [Lorna A. Syme](#)
Subject: RE: Responses to OGE Initial Questions -- STM
Date: Wednesday, December 28, 2016 10:13:41 AM
Attachments: [9830367_5_ksl.docx](#)

12 page attachment withheld in full - (b)(3), (4), (5), (6)

Some thoughts.

From: Lorna A. Syme
Sent: Wednesday, December 28, 2016 9:18 AM
To: Keith Labedz
Subject: FW: Responses to OGE Initial Questions -- STM

11 page attachment withheld in full - (b)(3), (4), (5), (6)

Referral to Treasury

Referral to Treasury

From: Rizzi, Robert (b) (6) >
Sent: Tuesday, December 27, 2016 6:23 PM
To: Granat, Rochelle
Cc: Mullis, Dianna
Subject: Responses to OGE Initial Questions -- STM

No attachment found in search

Attached please find our responses to the questions raised by OGE on December 21, with respect to the 278e submitted on December 16. Could you please forward a copy to the appropriate reviewer(s) at OGE? And of course would be happy to answer any questions you or OGE may have.

Please note that there are a few items for which we are still obtaining information, but in the interests of moving this ahead, we wanted to get these responses in your hands as soon as possible. We will supplement these responses with that information as soon as possible.

We look forward to speaking with you soon.

Bob

Robert Rizzi

Partner

(b) (6)

Step toe

+1 202 429 6226 direct

+1 212 506 3935 NY

+1 (b) (6) mobile

+1 202-261-7549 fax

Step toe & Johnson LLP

1330 Connecticut Avenue, NW

Washington, DC 20036

www.step toe.com

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From: [Lorna A. Syme](#)
To: (b)(6) - Peter Riesen's email address
Cc: (b)(6) - Rochelle Granat's email address; (b)(6) - Elizabeth Horton's email address; [Keith Labeledz](#)
Subject: RE: Responses to OGE Initial Questions -- STM
Date: Wednesday, December 28, 2016 4:08:34 PM

Yes, 1:30 works for us. Thank you.

Referral to Treasury



From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Wednesday, December 28, 2016 3:40 PM
To: Riesen, Peter; (b)(6) - Robert Rizzi's email address; Horton, Elizabeth; (b)(6) - Dianna Mullis's email address
Cc: Keith Labeledz; Granat, Rochelle
Subject: RE: Responses to OGE Initial Questions -- STM

How about 3:00 for the call?

Referral to Treasury



From: Rizzi, Robert (b) (6)
Sent: Wednesday, December 28, 2016 3:21 PM
To: Lorna A. Syme; Horton, Elizabeth; Riesen, Peter; Mullis, Dianna
Cc: Keith Labeledz
Subject: RE: Responses to OGE Initial Questions -- STM

How about tomorrow afternoon? Dianna will be back then and we should be able to answer your questions.

We have a call at 2 but otherwise flexible.

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Wednesday, December 28, 2016 3:19 PM
To: (b)(6) - Elizabeth Horton's email address; (b)(6) - Peter Riesen's email address; Mullis, Dianna; Rizzi, Robert
Cc: Keith Labeledz
Subject: RE: Responses to OGE Initial Questions -- STM

Thank you for the responses. We do have a few disclosure questions/comments that we think might

be more effectively addressed in a telephone conversation. Is there a time this afternoon or tomorrow that we could discuss?

Keith Labeledz and I will be on the call for OGE. We are available most of the day tomorrow, so please suggest a time.

Thank you.

Lorna A. Syme

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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Rest of chain partially released above



From: Lorna A. Syme [mailto:lasyme@oge.gov]
Sent: Wednesday, December 28, 2016 5:02 PM
To: Riesen, Peter; Horton, Elizabeth
Subject: initial comments on chart

4 page attachment withheld in full - (b)(3), (4), (5), (6)

Peter and Beth:

Attached are select comments on the response chart that the representative provided. I wanted to at least respond to some of the low-hanging comments so they could keep moving on the report. We will discuss many of the more complicated reporting issues during our conversation tomorrow.

Please let me know if you prefer that I email the representatives directly on technical reporting issues.

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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Referral to Treasury



From: Lorna A. Syme [mailto:lasyme@oge.gov]
Sent: Wednesday, January 04, 2017 11:08 AM
To: Riesen, Peter
Subject: voicemail

Hi Peter:

I tried returning your call at the number you left on the voicemail but no one picked up. I'm teleworking today so the number I was calling from was personal/not government.

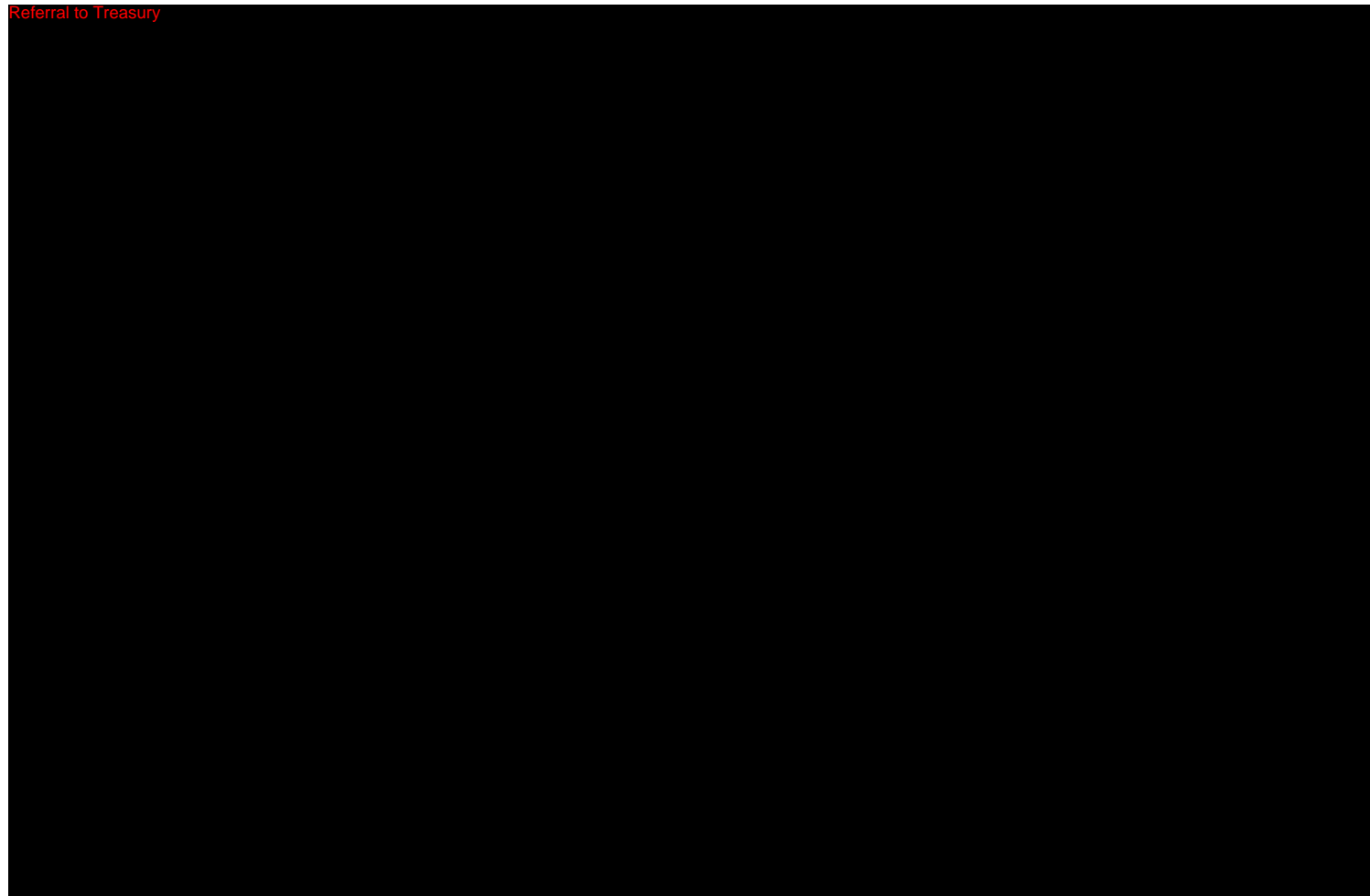
Feel free to call me back at your convenience.

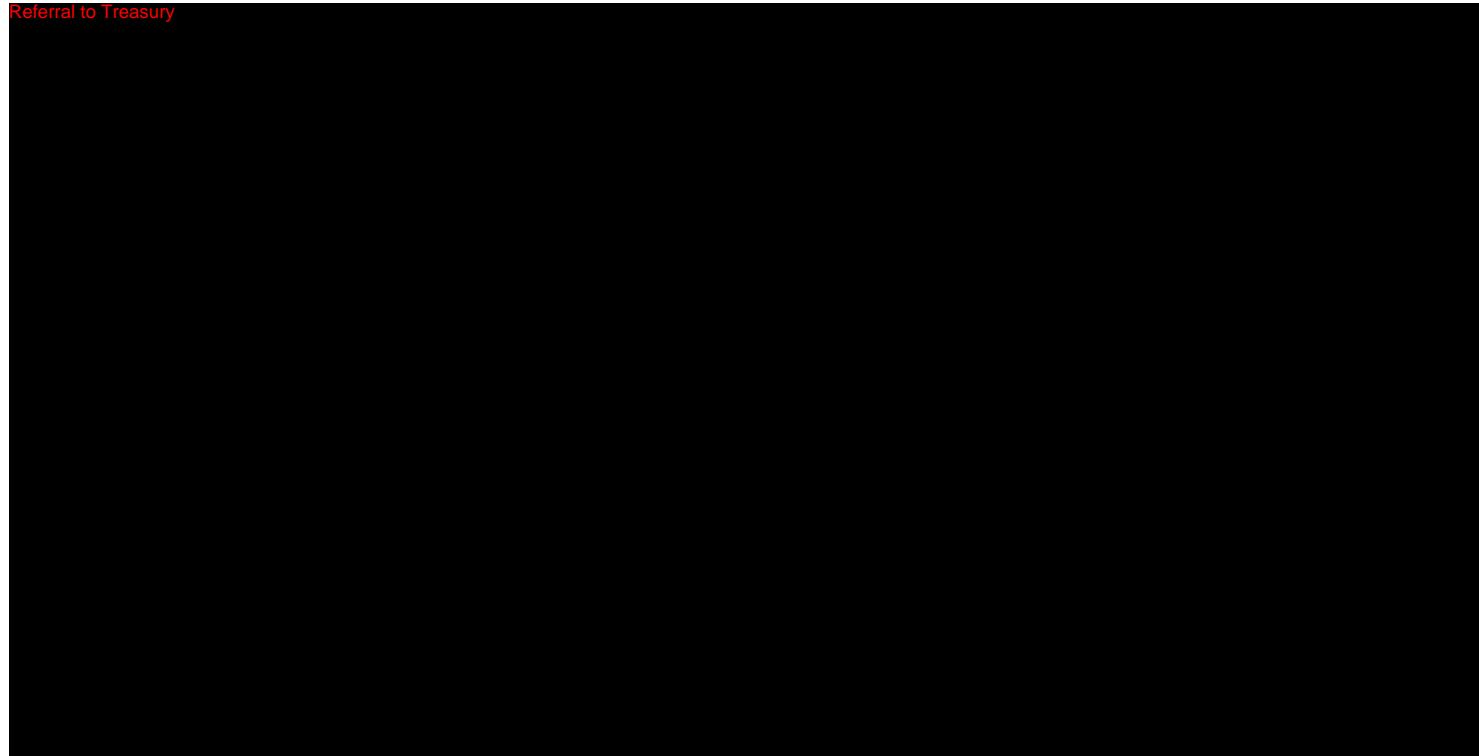
Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
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From: Mullis, Dianna (b) (6)]
Sent: Thursday, January 05, 2017 3:52 PM
To: Horton, Elizabeth; Rizzi, Robert
Cc: Riesen, Peter; Granat, Rochelle
Subject: RE: OGE questions

No attachment found in search



Beth,

See attached. Let me know if you have any questions.

Best,
Dianna

Referral to Treasury



From: Mullis, Dianna (b) (6)
Sent: Thursday, January 05, 2017 3:28 PM
To: Horton, Elizabeth; Rizzi, Robert
Cc: Riesen, Peter; Granat, Rochelle
Subject: RE: OGE questions

Yes, all questions were reconciled in the revisions to the 278. We will draft responses to clarify and send them over.

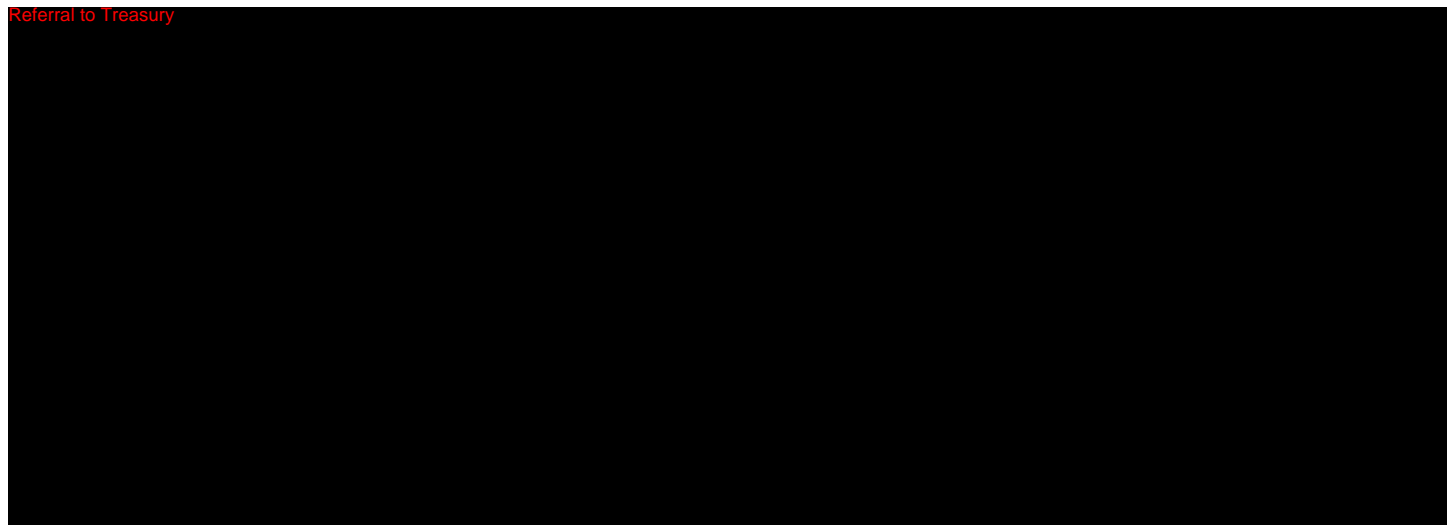
Dianna

Referral to Treasury



Referral to Treasury





Referral to Treasury



[REDACTED]

From: Deborah J. Bortot [mailto:djbortot@oge.gov]
Sent: Thursday, January 05, 2017 7:25 PM
To: Horton, Elizabeth; Riesen, Peter
Cc: Lorna A. Syme; Heather A. Jones
Subject: Ethics Agreement

7 page attachment withheld in full - (b)(3), (4), (5), (6)

Beth and Peter,

I've attached the latest version of the ethics agreement. We've tracked the changes.

Thanks,
Deb

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From: Rizzi, Robert (b) (6)
Sent: Thursday, January 05, 2017 7:00 PM
To: Granat, Rochelle; Horton, Elizabeth; Riesen, Peter
Cc: Mullis, Dianna
Subject: RE: STM

No attachment found in search

Here is the answer we previously provided on (b)(3), (5), (6).

Just to reiterate, this is not an interest that could be divested without considerable concern, especially at this point.

From: Rizzi, Robert
Sent: Friday, December 30, 2016 12:27 PM
To: (b)(6) - Rochelle Granat's email address ; (b)(6) - Elizabeth Horton's email address ; (b)(6) - Peter Riesen's email address
Cc: Mullis, Dianna
Subject: RE: STM

(b)(3), (4), (5), (6)

Hope that helps.

Referral to Treasury

Referral to Treasury

Referral to Treasury

From: Mullis, Dianna (b) (6)
Sent: Thursday, January 05, 2017 6:17 PM
To: Horton, Elizabeth; Riesen, Peter; Granat, Rochelle
Subject: STM Updated 278e

No attachment found in search

Attached is the latest draft of the 278e. The substantive changes are additions of positions 52-54 in Part 1 and the addition of sub-assets to Asset 6.6, Part 2.

Let me now if you have any questions.

Dianna

Dianna M. Mullis
Associate

(b) (6)

Step toe

(b) (6)

+1 202 429 3902 fax

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Washington, DC 20036
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From: [Lorna A. Syme](#)
To: ["Mullis, Dianna"](#)
Subject: RE: Outstanding questions on 278e - STM
Date: Friday, January 06, 2017 2:01:39 PM

Thanks.

From: Mullis, Dianna (b) (6)
Sent: Friday, January 06, 2017 1:53 PM
To: Lorna A. Syme
Subject: RE: Outstanding questions on 278e - STM

Lorna,

One additional change – we have added the (b)(3), (6) to the 278e. It is now listed as asset 46 on Part 6.

Best,
Dianna

From: Mullis, Dianna
Sent: Friday, January 06, 2017 1:06 PM
To: 'Lorna A. Syme'; (b)(6) - Elizabeth Horton's email address; (b)(6) - Peter Riesen's email address
Cc: Rizzi, Robert
Subject: RE: Outstanding questions on 278e - STM

4 page attachment withheld in full - (b)(3), (4), (5), (6)

See responses attached. Feel free to give me a call if you would like to discuss.

The 278e has been updated in Integrity accordingly.

Dianna

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Thursday, January 05, 2017 7:45 PM
To: (b)(6) - Elizabeth Horton's email address; (b)(6) - Peter Riesen's email address
Cc: Mullis, Dianna; Rizzi, Robert
Subject: Outstanding questions on 278e - STM

3 page attachment withheld in full - (b)(3), (4), (5), (6)

Attached are questions on the 278e. Let me know if you need clarification on the question.

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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From: [Heather A. Jones](#)
To: [Lorna A. Syme](#)
Subject: RE: nominee
Date: Friday, January 06, 2017 3:43:24 PM

I think it should say this will cease if I am confirmed.

From: Lorna A. Syme
Sent: Friday, January 06, 2017 3:29 PM
To: Deborah J. Bortot; Heather A. Jones
Subject: nominee

(b)(3), (5), (6)

A large black rectangular redaction box covers the body of the email, obscuring the main content of the message.

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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Referral to Treasury



From: Mullis, Dianna (b) (6)
Sent: Friday, January 06, 2017 4:16 PM
To: Horton, Elizabeth
Cc: Rizzi, Robert; Granat, Rochelle; Riesen, Peter
Subject: RE: Ethics Agreement

The following changes were made to the 278e:

(b)(3), (5), (6)



Let me know if you have questions.

Dianna

From: Mullis, Dianna
Sent: Friday, January 06, 2017 3:04 PM
To: 'Elizabeth.Horton@treasury.gov'
Cc: Rizzi, Robert; (b)(6) - Rochelle Granat's email address ; (b)(6) - Peter Riesen's email address
Subject: RE: Ethics Agreement

Yes, those changes are correct. We are doing a final review on the 278e.

Dianna

Referral to Treasury



Referral to Treasury

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Friday, January 06, 2017 2:25 PM
To: Horton, Elizabeth; Riesen, Peter
Subject: Ethics Agreement

Just confirming where I think we are now.

(b)(3), (5), (6)

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
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From: [Rizzi, Robert](#)
To: (b)(6) - Peter Riesen's email address; [Mullis, Dianna](#); [Deborah J. Bortot](#); [Lorna A. Syme](#); [Heather A. Jones](#)
Cc: (b)(6) - Rochelle Granat's email address; (b)(6) - Elizabeth Horton's email address
Subject: RE: Revised STM EA
Date: Friday, January 06, 2017 6:01:42 PM

Peter –

We are fine with this draft and these changes. If OGE has no further changes, and you can put this in final form, we can get it to Steven for his signature.

Thanks for the work on this.

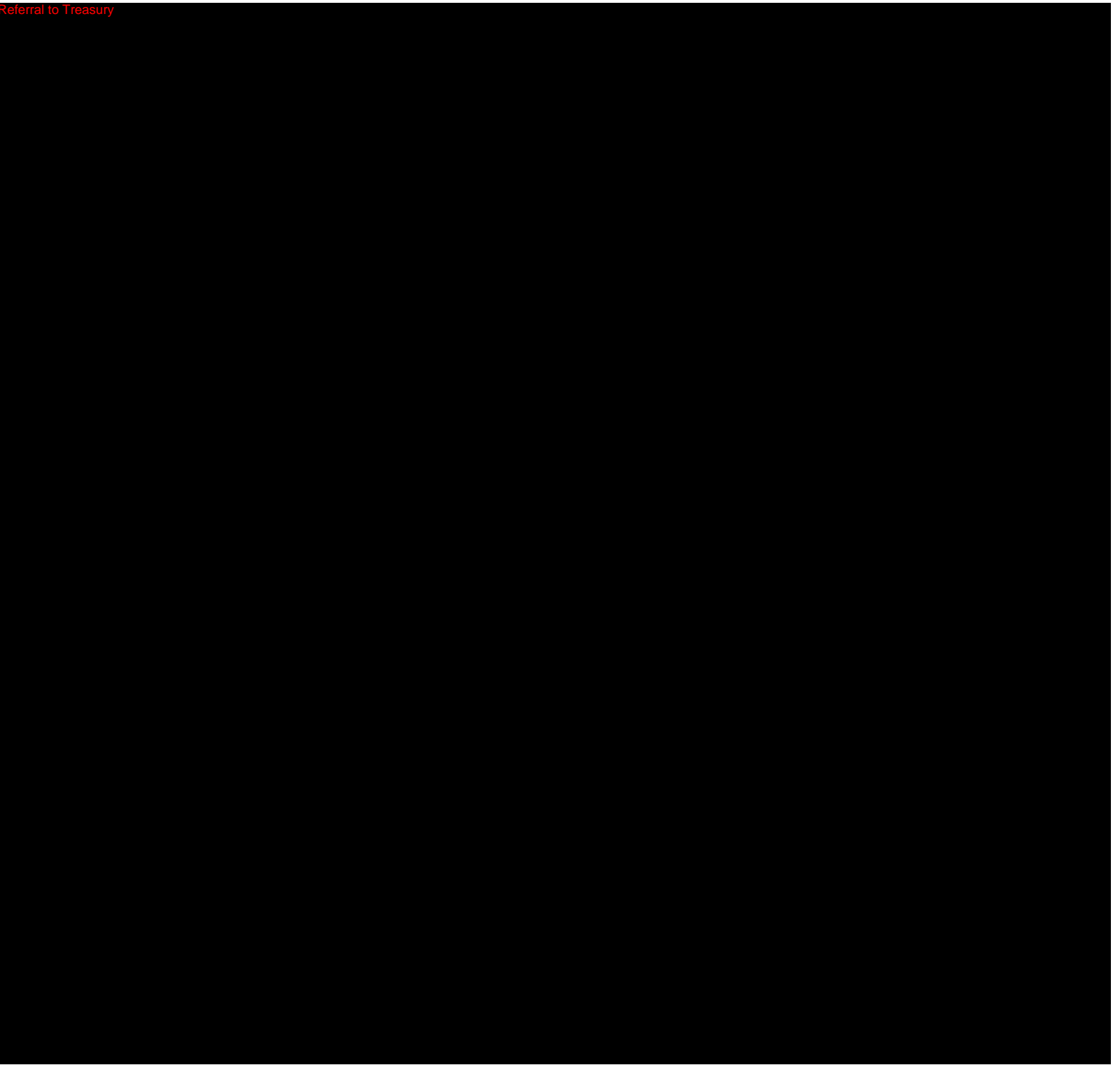
Bob

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A second large rectangular area of the document is completely redacted with a solid black fill. The text "Referral to Treasury" is visible in the top-left corner of this redacted area.



Referral to Treasury

From: Lorna A. Syme [mailto:lasyme@oge.gov]
Sent: Friday, January 06, 2017 06:27 PM
To: Horton, Elizabeth
Cc: Riesen, Peter
Subject: RE: Ethics Agreement

The 278e was looked at by Deb and Heather – but there have been a lot of changes (additions, deletions, etc) and they will need to look at it again. Since this is a Secretary report, Walt will want to review it as well before it is precleared. There could still be more questions. I think we are close but we are not there yet.

Even when we preclear – the filer won't resubmit the report until we receive clearance from the transition team. So no need to worry about signatures at this point.

I'm waiting to hear from Deb and Heather on the ethics agreement. Walt will want to review that again as well.

Referral to Treasury

From: Mullis, Dianna
Sent: Friday, January 6, 2017 5:58 PM
To: Lorna A. Syme
Cc: Horton, Elizabeth; Riesen, Peter
Subject: RE: Ethics Agreement

(b)(3), (5), (6)

From: Lorna A. Syme [mailto:lasyme@oge.gov]
Sent: Friday, January 06, 2017 5:24 PM
To: Mullis, Dianna
Cc: (b)(6) - Elizabeth Horton's email address, (b)(6) - Peter Riesen's email address
Subject: RE: Ethics Agreement

Please confirm he is not a (b)(3), (6). If he is a

(b)(3), (5), (6)

From: Mullis, Dianna (b) (6)
Sent: Friday, January 06, 2017 4:17 PM
To: Lorna A. Syme
Subject: FW: Ethics Agreement

Lorna,

Please see below changes made to the 278e in Integrity.

Dianna

From: Mullis, Dianna
Sent: Friday, January 06, 2017 4:16 PM
To: (b)(6) - Elizabeth Horton's email address
Cc: Rizzi, Robert (b)(6) - Rochelle Granat's email address; (b)(6) - Peter Riesen's email address
Subject: RE: Ethics Agreement

The following changes were made to the 278e:

(b)(3), (5), (6)

Let me know if you have questions.

Dianna

From: [Lorna A. Syme](#)
To: (b)(6) - Elizabeth Horton's email address
Subject: RE: Nominee - STM
Date: Friday, January 06, 2017 8:47:49 PM

(b) (5)

Referral to Treasury

From: Lorna A. Syme
Sent: Friday, January 6, 2017 7:42 PM
To: Horton, Elizabeth; (b) (6)
Cc: Riesen, Peter; Granat, Rochelle; (b) (6)
Subject: RE: Nominee - STM

Just a reminder that in (b) (5) OGE will want the (b)(3), (6).

Referral to Treasury

From: Rizzi, Robert
Sent: Friday, January 6, 2017 7:14 PM
To: Horton, Elizabeth
Cc: lasyme@oge.gov; Riesen, Peter; Granat, Rochelle; Mullis, Dianna
Subject: Re: Nominee – STM

Ok. I will get that for you. It is much (b)(3), (6) so we can start there.

Bob Rizzi
Steptoe & Johnson LLP
Washington Office
212-429-6226 (direct)
(b) (6) (cell)
(b) (6)

Referral to Treasury

From: Rizzi, Robert
Sent: Friday, January 6, 2017 7:09 PM
To: Lorna A. Syme
Cc: Riesen, Peter; Granat, Rochelle; Horton, Elizabeth; Mullis, Dianna
Subject: Re: Nominee - STM

Ok. Beth please let me know if you need anything on the (b) (5)

Bob Rizzi
Steptoe & Johnson LLP
Washington Office
212-429-6226 (direct)
(b) (6) (cell)
(b) (6)

On Jan 6, 2017, at 7:03 PM, Lorna A. Syme <lasyme@oge.gov> wrote:

I spoke to Peter and Dianna this evening to explain that OGE's Director has asked that (b) (5)

OGE's Director will be reviewing the documents on Monday for preclearance review. We will need to have a (b) (5) for the review.

I will be available this weekend by telephone and email.

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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Referral to Treasury

From: Mullis, Dianna (b) (6)
Sent: Sunday, January 8, 2017 12:55 PM
To: Horton, Elizabeth; Riesen, Peter
Subject: RE: STM - New Position

(b) (5)

I will work on getting you the exact figures.

Dianna

Referral to Treasury

From: Mullis, Dianna
Sent: Sunday, January 8, 2017 10:07 AM
To: Riesen, Peter; Horton, Elizabeth
Subject: STM - New Position

Peter and Beth,

(b)(3), (5), (6)

Let us know what you need on our end.

Thanks,
Dianna

Dianna M. Mullis

Associate

(b) (6)

Step toe

(b) (6)

direct
cell

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From: [Deborah J. Bortot](#)
To: [Keith Labedz](#); [Heather A. Jones](#); [Lorna A. Syme](#)
Subject: RE: (b)(3), (6) question
Date: Monday, January 09, 2017 8:44:50 AM

Keith's proposal would be another acceptable option. (b)(3), (5), (6)

However, I would be fine with any of the three options.

From: Keith Labedz
Sent: Monday, January 09, 2017 8:42 AM
To: Deborah J. Bortot; Heather A. Jones; Lorna A. Syme
Subject: RE: (b)(3), (6) question

I agree. The other option they might use is (b)(3), (5), (6)

From: Deborah J. Bortot
Sent: Sunday, January 08, 2017 10:26 PM
To: Heather A. Jones; Lorna A. Syme; Keith Labedz
Subject: Re: (b)(3), (6) question

Lorna,

At this point I defer to what you think works best. (b)(3), (5), (6)

Go with what you think is best. I'm fine with it either way.

Deb

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Heather A. Jones
Sent: Sunday, January 8, 2017 9:35 PM
To: Lorna A. Syme; Keith Labedz; Deborah J. Bortot
Subject: Re: (b)(3), (6) question

That makes sense to me but I defer to the majority

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Lorna A. Syme
Sent: Sunday, January 8, 2017 9:28 PM
To: Keith Labedz; Deborah J. Bortot; Heather A. Jones
Subject: (b)(3), (6) question

(b)(3), (5), (6)

(b)(3), (5), (6)



Thanks!

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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Referral to Treasury



-----Original Message-----

From: Mullis, Dianna (b) (6)
Sent: Sunday, January 08, 2017 1:54 PM
To: Horton, Elizabeth
Cc: Rizzi, Robert
Subject: RE: STM

Beth,

(b)(3), (4), (5), (6)



Let us know if you need additional details.

Dianna

-----Original Message-----

From: Rizzi, Robert
Sent: Sunday, January 08, 2017 1:16 PM
To: (b)(6) - Elizabeth Horton's email address
Cc: Mullis, Dianna
Subject: RE: STM

Beth --

(b)(3), (4), (5), (6)



Let us know if you need anything.

Bob

Referral to Treasury



From: Rizzi, Robert
Sent: Friday, January 6, 2017 8:10 PM
To: Horton, Elizabeth
Cc: Mullis, Dianna
Subject: Re: STM

Got it -- just curious (b) (5)

Bob Rizzi
Cell number (b) (6)

Referral to Treasury

> Original Message
> From: Rizzi, Robert
> Sent: Friday, January 6, 2017 7:58 PM
> To: Horton, Elizabeth
> Cc: Mullis, Dianna
> Subject: STM

>

>

> (b) (5)

>

>

> Bob Rizzi
> Cell number (b) (6)

>

>

Referral to Treasury

From: Mullis, Dianna (b) (6)
Sent: Monday, January 09, 2017 10:58 AM
To: Granat, Rochelle; Horton, Elizabeth; Riesen, Peter
Subject: Waiver

I just left a voicemail for Rochelle, but in the interest of time, thought I would also email the group. (b)(3), (5), (6)

(b)(3), (5), (6) With that development, I believe there are no other outstanding issues and the ethics agreement can be finalized. Is that correct?

Dianna M. Mullis
Associate

(b) (6)

Step toe

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+ (b) (6) cell
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From: [Mullis, Dianna](#)
To: [Lorna A. Syme](#)
Subject: RE: STM - New Position
Date: Monday, January 09, 2017 11:09:05 AM

Yes, correct.

From: Lorna A. Syme [mailto:lasyme@oge.gov]
Sent: Monday, January 09, 2017 11:05 AM
To: Mullis, Dianna
Subject: RE: STM - New Position

(b)(3), (5), (6)

From: Mullis, Dianna (b) (6)
Sent: Sunday, January 08, 2017 10:09 AM
To: Lorna A. Syme
Subject: STM - New Position

Lorna,

(b)(3), (5), (6)

I have connected with Treasury to include it in the ethics agreement.

Best,

Dianna

Dianna M. Mullis

Associate

(b) (6)

Step toe

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Referral to Treasury

From: Lorna A. Syme [mailto:lasyme@oge.gov]
Sent: Monday, January 09, 2017 1:05 PM
To: 'Mullis, Dianna'
Cc: Horton, Elizabeth; Riesen, Peter; (b)(6) - Robert Rizzo's email address
Subject: RE: (b)(3), (b)(6)

(b)(3), (5), (6)

I will delete from the latest draft that Peter sent this morning.

From: Mullis, Dianna (b)(6)
Sent: Monday, January 09, 2017 11:56 AM
To: Lorna A. Syme
Subject: RE: (b)(3), (b)(6)

(b)(3), (5), (6)

From: Lorna A. Syme [mailto:lasyme@oge.gov]
Sent: Monday, January 09, 2017 11:32 AM
To: Mullis, Dianna
Subject: RE: (b)(3), (b)(6)

Thank you. (b)(3), (5), (6)

From: Mullis, Dianna (b)(6)]
Sent: Monday, January 09, 2017 11:28 AM
To: Lorna A. Syme
Subject: RE: (b)(3), (b)(6)

This has been completed. Thanks.

From: Lorna A. Syme [mailto:lasyme@oge.gov]
Sent: Monday, January 09, 2017 10:23 AM
To: Mullis, Dianna
Subject: RE: (b)(3), (b)(6)

(b)(3), (5), (6)

Happy to discuss at 202-482-9277.
Lorna

From: Mullis, Dianna (b)(6)
Sent: Sunday, January 08, 2017 8:00 PM
To: Lorna A. Syme
Subject: STM - Bank Accounts

Hi Lorna,

(b)(3), (5), (6)

Let me know if the question is confusing.

Thanks,
Dianna

Dianna M. Mullis
Associate
(b)(6)
Step toe

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From: [Lorna A. Syme](#)
To: (b)(6) - Elizabeth Horton's email address
Subject: (b)(3), (b)(6)
Date: Monday, January 09, 2017 4:31:05 PM

So the two issues are:

(b)(3), (5), (6)



Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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From: [Lorna A. Syme](#)
To: ["Mullis, Dianna"; "Rizzi, Robert"](#)
Subject: RE: (b)(3), (6)
Date: Monday, January 09, 2017 6:50:48 PM

(b)(5), (6)

From: Mullis, Dianna (b)(6)
Sent: Monday, January 09, 2017 6:42 PM
To: Rizzi, Robert; Lorna A. Syme
Subject: RE: (b)(3), (6)

(b)(3), (5), (6)

Best,

Dianna

From: Rizzi, Robert
Sent: Monday, January 09, 2017 6:14 PM
To: 'Lorna A. Syme'
Cc: Mullis, Dianna
Subject: RE: (b)(3), (6)

Should not be a problem – (b)(3), (4), (5), (6)
We will get this from Steven later tonight or tomorrow.
Thanks Lorna.

Bob

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Monday, January 09, 2017 6:08 PM
To: Rizzi, Robert
Cc: Mullis, Dianna
Subject: RE: (b)(3), (6)

(b)(3), (5), (6)

Is there a

concern that you will not be able to get the rate tomorrow?

From: Rizzi, Robert (b)(6)
Sent: Monday, January 09, 2017 6:00 PM
To: Lorna A. Syme
Cc: Mullis, Dianna
Subject: RE: (b)(3), (6)

Lorna –

We are making the two changes in the 278e – good catches.

(b)(3), (5), (6)

From: Rizzi, Robert
Sent: Monday, January 09, 2017 5:52 PM
To: 'lasyme@oge.gov'
Cc: Mullis, Dianna
Subject: FW: (b)(3), (6)

Lorna –

Dianna is in a meeting but let me see if I can find the answers.

Bob

From: "Lorna A. Syme" <lasyme@oge.gov>
Date: January 9, 2017 at 5:32:00 PM EST

To: "Mullis, Dianna" (b) (6)

Subject: RE: (b)(3), (6)

Sorry – just a couple more things (and hopefully this will be it with the 278e). I will forward the revised ethics agreement shortly.

(b)(3), (5), (6)

From: Mullis, Dianna [<mailto:dmullis@steptoe.com>]

Sent: Monday, January 09, 2017 3:50 PM

To: Lorna A. Syme

Subject: RE: (b)(3), (6)

1 page attachment withheld in full - (b) (3), (5), (6)

Here you go.

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]

Sent: Monday, January 09, 2017 3:47 PM

To: Mullis, Dianna

Subject: RE: (b)(3), (6)

I don't seem to have a copy of the (b)(3), (6).

Would you forward a copy of that please.

From: Mullis, Dianna [<mailto:dmullis@steptoe.com>]

Sent: Monday, January 09, 2017 3:06 PM

To: Lorna A. Syme

Subject: RE: (b)(3), (6)

Thanks. See responses below.

When you have a revised draft of the ethics agreement, could you please forward?

Steven would like to review as soon as possible.

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]

Sent: Monday, January 09, 2017 2:59 PM

To: Mullis, Dianna

Subject: RE: (b)(3), (6)

We are still reviewing all of the documents. We do understand this is a priority and will keep you informed of any questions.

Comments/questions:

(b)(3), (5), (6)

From: Mullis, Dianna (b) (6)

Sent: Monday, January 09, 2017 2:24 PM

To: Lorna A. Syme

Subject: RE: (b)(3), (6)

Hi Lorna,

Any update on the items below? We would like to manage expectations with the transition team as to timing. As you know, it is critical that we get this completed today.

Dianna

From: Mullis, Dianna

Sent: Monday, January 09, 2017 11:49 AM

To: 'Lorna A. Syme'

Subject: RE: (b)(3), (6)

Perfect; thanks. Do you anticipate preclearing today? And who is your contact on the transition team that will be notified when preclearance is granted?

Dianna

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]

Sent: Monday, January 09, 2017 11:47 AM

To: Mullis, Dianna

Subject: RE: (b)(3), (6)

We are reviewing the documents. We may have additional questions. Once we preclear we send the ethics agreement to the transition team (and they can access Integrity to review the 278e). We then wait until the transition team authorizes us to forward the paperwork to the Senate Committee. At that point we will contact you and the agency to have the filer sign the ethics agreement and resubmit the 278e in Integrity to the agency for certification. The agency forwards the signed paperwork to us and we submit to the Senate Committee.

From: Mullis, Dianna (b)(6)

Sent: Monday, January 09, 2017 11:43 AM

To: Lorna A. Syme

Subject: RE: (b)(3), (6)

I am checking with EY on this.

We want to be clear on the process going forward today. You now have the final draft of the ethics agreement from Treasury. My understanding is that you will finalize the ethics agreement and pre-clear the 278e this afternoon. You will then send that package to the transition team?

Thanks,

Dianna

Rest of chain partially released above

From: [Mullis, Dianna](#)
To: [Lorna A. Syme](#)
Subject: Cell
Date: Monday, January 09, 2017 7:15:27 PM

Lorna,

I am heading out of the office, but will be back online in about 45 minutes. I'm available on my cell phone if you need anything ((b) (6))).

Thanks for all your help today.

Dianna

Dianna M. Mullis

Associate

((b) (6))

Step toe

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+1 202 429 3902 fax Washington, DC 20036

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From: Deborah J. Bortot
Sent: Monday, January 9, 2017 7:43 PM
To: Lorna A. Syme; Horton, Elizabeth
Subject: FW: STM

From: Deborah J. Bortot
Sent: Monday, January 09, 2017 7:43 PM
To: 'Rizzi, Robert'
Subject: RE: STM

Thanks, Bob. (b) (5)

From: Rizzi, Robert (b) (6)
Sent: Monday, January 09, 2017 7:34 PM
To: Lorna A. Syme
Cc: Deborah J. Bortot
Subject: Re: STM

This looks fine to us. Please let us know when you have precleared. Thanks for all your work.

Bob Rizzi
Steptoe & Johnson LLP
Washington Office
202-429-6226 (direct)
(b) (6) (cell)
(b) (6)

On Jan 9, 2017, at 7:29 PM, Lorna A. Syme <lasyme@oge.gov> wrote:

Revised ethics agreement.

14 page attachment withheld in full - (b)(3), (4), (5), (6)

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500

Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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<Mnuchin Ethics Agreement for preclearance.docx.awsec>

<Mnuchin Ethics Agreement for preclearance clean copy.docx.awsec>

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From: [Deborah J. Bortot](#)
To: ["Ann M. Donaldson"](#)
Cc: [Lorna A. Syme](#); [David J. Apol](#); [Heather A. Jones](#); [Sandra S. Mabry](#); [Keith Labedz](#); [Teresa L. Williamson](#); [Rodrick T. Johnson](#); [Emory A. Rounds III](#); [REDACTED] [REDACTED]
Subject: PRECLEARED: Steven Mnuchin
Date: Monday, January 09, 2017 9:31:13 PM
Attachments: [Mnuchin Ethics Agreement 1 9 17 900pm.docx](#) [REDACTED]

Annie, Steven Mnuchin is precleared.

I've attached the ethics agreement.

Thanks!

Deb

Deborah J. Bortot
Chief, Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9227
Facsimile: (202) 482-9237

From: [Mullis, Dianna](#)
To: (b)(6) - Peter Riesen's email address; [Rizzi, Robert](#); [Deborah J. Bortot](#); [Lorna A. Syme](#)
Cc: (b)(6) - Rochelle Granat's email address; (b)(6) - Elizabeth Horton's email address
Subject: RE: Mnuchin EA
Date: Tuesday, January 10, 2017 3:21:56 PM

I understand that the 278e cannot be finalized until PTT gives authorization, but can we finalize this for Steven's signature?

Dianna

Referral to Treasury



Referral to Treasury



From: Rizzi, Robert

Sent: Monday, January 9, 2017 8:02 PM

To: 'Deborah J. Bortot'; 'Lorna A. Syme'; Riesen, Peter; Horton, Elizabeth; Granat, Rochelle

Cc: Mullis, Dianna

Subject: FW: Mnuchin EA

8 page attachment withheld in full - (b)(3), (4), (5), (6)

We assume this latest from Peter is the final version with the one revision. It is fine with us.

Can you send a clean version of this document?

Referral to Treasury

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]

Sent: Monday, January 09, 2017 7:25 PM

To: Riesen, Peter

Cc: Granat, Rochelle; Horton, Elizabeth; (b)(6) - Robert Rizzo's email address

(b)(6) - Dianna Mullis's email address

Subject: RE: Mnuchin EA

8 page attachment withheld in full - (b)(3), (4), (5), (6)

Attached please find OGE's revisions to the ethics agreement.

Referral to Treasury

Referral to Treasury

From: Mullis, Dianna (b) (6)
Sent: Monday, January 09, 2017 10:58 AM
To: Granat, Rochelle; Horton, Elizabeth; Riesen, Peter
Subject: Waiver

I just left a voicemail for Rochelle, but in the interest of time, thought I would also email the group. (b)(3), (5), (6)

(b)(3), (5), (6) With that development, I believe there are no other outstanding issues and the ethics agreement can be finalized. Is that correct?

Dianna M. Mullis

Associate

(b) (6)

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From: [Rizzi, Robert](#)
To: [Walter M. Shaub](#)
Cc: [Lorna A. Syme](#) (b)(6) - Rochelle Granat's email address
Subject: Re: Mnuchin
Date: Tuesday, January 10, 2017 3:29:05 PM

Excellent. Thanks again.

Bob Rizzi
Steptoe & Johnson LLP
Washington Office
202-429-6226 (direct)
(b) (6) (cell)
(b) (6)

On Jan 10, 2017, at 3:28 PM, Walter M. Shaub <wmschaub@oge.gov> wrote:

Ok we just got the green light. Let's move this thing fast.

Walter M. Shaub, Jr.

Director

U.S. Office of Government Ethics

1201 New York Avenue, NW, Suite 500

Washington, DC 20005-3917

Telephone: 202.482.9292

Email: walter.schaub@oge.gov

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From: [Heather A. Jones](#)
To: [Lorna A. Syme](#); [Teresa L. Williamson](#)
Subject: Fw: Steven Mnuchin
Date: Tuesday, January 10, 2017 3:31:00 PM

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Ann M Donaldson (b) (6)
Sent: Tuesday, January 10, 2017 3:26 PM
To: Deborah J. Bortot; Heather A. Jones
Subject: Steven Mnuchin

On behalf of the President-Elect, this email serves as confirmation that the President-Elect intends to nominate Mr. Steven Mnuchin to be Secretary of the Treasury. Please transmit his pre-cleared 278 report to the appropriate Senate committee.

Thank you,
Annie

Ann M. Donaldson
Associate
[JONES DAY® - One Firm WorldwideSM](#)
51 Louisiana Avenue, NW
Washington, DC 20001
Office + (b) (6)

=====
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=====

From: [Mullis, Dianna](#)
To: [Lorna A. Syme](#); (b)(6) - Peter Riesen's email address
Subject: RE: STM - Integrity
Date: Tuesday, January 10, 2017 4:35:05 PM

Thanks very much. We will get it to you as soon as we can.

From: Lorna A. Syme [mailto:lasyme@oge.gov]
Sent: Tuesday, January 10, 2017 4:31 PM
To: Mullis, Dianna; (b)(6) - Peter Riesen's email address
Subject: RE: STM - Integrity

Yes. Our Director will be here after 5. Please have Mr. Mnuchin sign asap or let us know if you anticipate a delay.

From: Mullis, Dianna (b)(6)
Sent: Tuesday, January 10, 2017 4:19 PM
To: (b)(6) - Peter Riesen's email address
Cc: Lorna A. Syme
Subject: STM - Integrity

Peter and Lorna,

Steven has a meeting on the Hill and cannot resubmit the 278 until after 5pm. Can you confirm that we can still get it to the Senate tonight?

We are sending someone over to get his signature on the ethics agreement now.

Thanks,

Dianna

Dianna M. Mullis

Associate

(b) (6)

Step toe

(b) (6)

direct

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From: [Lorna A. Syme](#)
To: [Sandra S. Mabry](#); [Heather A. Jones](#)
Subject: FW: STM - Signed EA
Date: Tuesday, January 10, 2017 5:53:41 PM
Attachments: [STM Ethics Agreement \(signed\).pdf](#)

Attachment released below

Attached is the signed/dated ethics agreement. I have compared it to the precleared draft and it looks good.

From: Mullis, Dianna (b) (6)
Sent: Tuesday, January 10, 2017 5:43 PM
To: (b)(6) - Peter Riesen's email address; (b)(6) - Elizabeth Horton's email address; (b)(6) - Rochelle Granat's email address; Lorna A. Syme
Cc: Rizzi, Robert; (b)(6) - Steven Mnuchin's email address
Subject: STM - Signed EA

Attachment released below

Attached please find the signed ethics agreement. Steven has also resubmitted the 278e in Integrity.

Please let us know when Treasury and OGE have certified and sent the documents to the Senate.

Thanks,
Dianna

Dianna M. Mullis
Associate
(b) (6)
Step toe

+1 (b) (6) direct
+1 (b) (6) cell
+1 202 429 3902 fax
Step toe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
www.step toe.com

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From: [Lorna A. Syme](#)
To: [Sandra S. Mabry](#)
Subject: FW: Mnuchin - final paperwork
Date: Tuesday, January 10, 2017 6:14:18 PM
Attachments: [201701101634.pdf](#)

Attachment released below

Referral to Treasury

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Tuesday, January 10, 2017 3:35 PM
To: Horton, Elizabeth; Riesen, Peter; Granat, Rochelle
Subject: Mnuchin - final paperwork
Importance: High

We have received word from the transition team authorizing us to forward Steven Mnuchin's paperwork to the Senate Committee. Please have the filer sign/date the ethics agreement and submit his 278e report in Integrity. Your DAEO or ADAEO should certify the report in Integrity and then forward the signed ethics agreement and your agency cover letter to us at your earliest convenience. Let me know if you have any questions.

Thank you.

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE's website: www.oge.gov
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From: [Lorna A. Syme](#)
To: (b)(6) - Peter Riesen's email address
Subject: RE: STM 278
Date: Tuesday, January 10, 2017 6:16:06 PM

Yes – we have it! Thank you!

Referral to Treasury



From: [Lorna A. Syme](#)
To: [Sandra S. Mabry](#)
Date: Tuesday, January 10, 2017 6:25:48 PM
Attachments: [Reviewer notes for preclearance.docx](#)

8 page attachment withheld in full - (b)(3), (4), (5), (6)

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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From: [Lorna A. Syme](#)
To: (b)(6) - Peter Riesen's email address; (b)(6) - Elizabeth Horton's email address; (b)(6) - Rochelle Granat's email address
Cc: (b)(6) - Robert Rizzi's email address; (b)(6) - Dianna Mullis's email address
Subject: RE: STM - Signed EA
Date: Tuesday, January 10, 2017 7:14:10 PM

OGE has certified the report and forwarded the documents to the Senate Committee.

Referral to Treasury



From: Mullis, Dianna (b) (6)
Sent: Tuesday, January 10, 2017 5:43 PM
To: Riesen, Peter; Horton, Elizabeth; Granat, Rochelle; Lorna A. Syme (lasyme@oge.gov)
Cc: Rizzi, Robert; (b) (6)
Subject: STM - Signed EA

Attachment released below

Attached please find the signed ethics agreement. Steven has also resubmitted the 278e in Integrity.

Please let us know when Treasury and OGE have certified and sent the documents to the Senate.

Thanks,
Dianna

Dianna M. Mullis
Associate

(b) (6)

Step toe

+1 (b) (6) direct
+1 (b) (6) cell
+1 202 429 3902 fax

Step toe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
www.step toe.com

From: [Teresa L. Williamson](#)
To: [Lorna A. Syme](#); "Elizabeth.Horton@treasury.gov"
Subject: Public Financial Disclosure Report of Steven T. Mnuchin
Date: Wednesday, January 11, 2017 2:56:41 PM
Attachments: [Mnuchin, Steven T. finalsenateltr.pdf](#)
[Mnuchin, Steven T. final278.pdf](#)
[Mnuchin, Steven T. finalEA.pdf](#)

Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Good Afternoon,

I've attached the financial disclosure package for Steven T. Mnuchin. President-Elect Trump has announced his intention to nominate Mr. Mnuchin for the position of Secretary, Department of the Treasury.

Thanks!

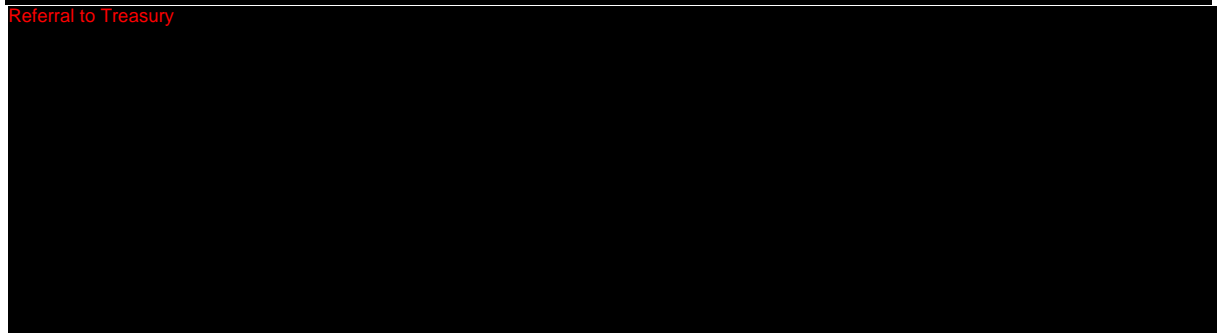
Sandra S. Mabry
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9283

From: [Lorna A. Syme](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: FW: STM
Date: Thursday, January 19, 2017 11:58:05 AM

Referral to Treasury



Referral to Treasury



From: Mullis, Dianna
Sent: Thursday, January 19, 2017 11:39 AM
To: Horton, Elizabeth
Cc: Riesen, Peter; Granat, Rochelle
Subject: RE: STM

The 278e is correct as filed. We originally filed his Senate Questionnaire on December 19th and updated after his 278e was certified.

Feel free to give me a call if you would like to discuss further.

Dianna

Referral to Treasury



From: [Lorna A. Syme](#)
To: [Lorna A. Syme](#)
Subject: FW: ethics agreement
Date: Monday, January 30, 2017 5:16:35 PM

Referral to Treasury



From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Sunday, January 08, 2017 9:49 PM
To: Horton, Elizabeth; Riesen, Peter
Subject: ethics agreement

3 page attachment withheld in full - (b)(3), (4), (5), (6)



Beth and Peter:

You may have already revised the ethics agreement. If not, I just took the latest draft that Peter sent on Friday and added the (b)(3), (6) added today.

Lorna

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From: [Lorna A. Syme](#)
To: [Lorna A. Syme](#)
Subject: FW: Ethics Agreement
Date: Monday, January 30, 2017 5:19:26 PM

Referral to Treasury



From: Mullis, Dianna (b) (6)
Sent: Friday, January 06, 2017 3:04 PM
To: Horton, Elizabeth
Cc: Rizzi, Robert; Granat, Rochelle; Riesen, Peter
Subject: RE: Ethics Agreement

Yes, those changes are correct. We are doing a final review on the 278e.

Dianna

Referral to Treasury



From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Friday, January 06, 2017 2:25 PM
To: Horton, Elizabeth; Riesen, Peter
Subject: Ethics Agreement

Just confirming where I think we are now.

(b)(3), (6)



ment A (b) (5)

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

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From: [Lorna A. Syme](#)
To: [Lorna A. Syme](#)
Subject: FW: Ethics Agreement
Date: Monday, January 30, 2017 5:20:09 PM

From: Deborah J. Bortot
Sent: Friday, January 06, 2017 8:22 AM
To: Lorna A. Syme
Subject: FW: Ethics Agreement

Let's discuss

Referral to Treasury



From: Deborah J. Bortot [<mailto:djbortot@oge.gov>]
Sent: Thursday, January 05, 2017 7:25 PM
To: Horton, Elizabeth; Riesen, Peter
Cc: Lorna A. Syme; Heather A. Jones
Subject: Ethics Agreement

7 page attachment withheld in full - (b)(3), (4), (5), (6)



Beth and Peter,

I've attached the latest version of the ethics agreement. We've tracked the changes.

Thanks,
Deb

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UNITED STATES OFFICE OF
GOVERNMENT ETHICS



JAN 10 2017

The Honorable Orrin Hatch
Chairman
Committee on Finance
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Steven T. Mnuchin. President-Elect Trump has announced his intention to nominate Mr. Mnuchin for the position of Secretary, Department of the Treasury.

We have reviewed the report and have obtained advice from the agency concerning any possible conflict in light of its functions and the nominee's proposed duties. Also enclosed is an ethics agreement outlining the actions that the nominee will undertake to avoid conflicts of interest. Unless a date for compliance is indicated in the ethics agreement, the nominee must fully comply within three months of confirmation with any action specified in the ethics agreement.

Based thereon, we believe that this nominee is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

Walter M. Shaub, Jr.
Director

Enclosures

January 10, 2017

Rochelle F. Granat
Assistant General Counsel
(General Law, Ethics & Regulation)
and Designated Agency Ethics Official
U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, D.C. 20220

Dear Ms. Granat:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Secretary of the Treasury.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

As required by 31 U.S.C. § 329(a)(1)(D), I will not purchase or divest obligations of a State or the United States during my appointment to the position of Secretary of the Treasury.

Within 90 days of my confirmation, I will divest my interests in the entities listed in Attachment A. With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

Within 120 days of my confirmation, I will divest my interests in Ratpac-Dune Entertainment Holdings LLC. With regard to these interests, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

Upon confirmation, I will ensure that all of my cash accounts are below thresholds insured by the Federal Deposit Insurance Corporation.

I will retain my unpaid position as President of Steven T. Mnuchin Inc. I am the sole owner of this entity, which I use to manage some of my investments. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Steven T. Mnuchin Inc. or its underlying assets, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I resigned from my positions as Vice Chairman and Director of CIT Group, Inc., in April 2016 and December 2016, respectively. Under the provisions of the merger of IMB Holdings LLC and CIT Group, Inc., a sum of cash, or holdback, is being reserved by CIT Group, Inc. in order to cover certain contingent liabilities of IMB Holdings LLC. Any excess is expected to be distributed to the Steven T. Mnuchin Revocable Trust and the Steven Mnuchin Dynasty Trust I between August 2018 and August 2020. Until I receive full payment, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the ability or willingness of CIT Group, Inc. to honor its contractual obligation, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). In addition, I have a restrictive covenant agreement with CIT Group, Inc. through July 2018. Until this agreement has expired, I will not participate personally and substantially in any particular matter involving specific parties in which I know CIT Group, Inc. or IMB Holdings LLC is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Following confirmation and before I assume the duties of the position of Secretary, I will provide you with a list of every asset that I acquired subsequent to filing my nominee financial disclosure report. I will abide by your decision regarding the divestiture or retention of these assets and, if you direct the divestiture of any asset, I will accomplish the divestiture within 90 days of my confirmation. In addition, I will meet in person with you during the first week of my service in the position of Secretary in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305.

Upon confirmation, I will resign from my positions with the entities listed in Attachment B. I previously resigned from my positions with the following entities: CIT Bank NA, Sears Holdings Inc., STM Capital LLC, the Museum of Contemporary Art, and IMB Management Holdings GP LLC. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Prior to or upon confirmation, I will fully disclose to you all assets of my fiancée that would have been reportable under 5 U.S.C. app. § 102 if we were married. Until we are married, I will not participate personally and substantially in any particular matter involving specific parties that to my knowledge has a direct and predictable effect on my fiancée's financial interests, or any member of my household, unless I am first authorized to participate pursuant to 5 C.F.R. § 2635.502(d), or would, if we were married, qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). Upon marriage I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's financial interests, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,



Steven T. Mnuchin

Attachment A to the Ethics Agreement of Steven T. Mnuchin

1. Goldman Sachs Financial Square Treasury Instruments Fund
2. Goldman Sachs Financial Square Treasury Obligations Fund
3. Goldman Sachs Financial Square Treasury Solutions Fund
4. iHeart Communications, Inc. Bond
5. AT&T Inc.
6. Berkshire Hathaway Inc.
7. Berry Ventures
8. Blackstone Group L.P.
9. Caesars Acquisition Company
10. CIT Group Inc.
11. Citigroup Inc.
12. Comcast Corporation
13. Fairpoint Communications, Inc.
14. Frontier Communications Corp.
15. General Electric Co.
16. Goldman Sachs Group, Inc.
17. Halo WeWin II LLC
18. Idearc Inc.
19. International Business Machines Corp.
20. Lands' End, Inc.
21. Lehman Brothers Holdings Inc.
22. Microsoft Corporation
23. Sears Holding Corporations
24. Sears Hometown and Outlet Stores, Inc.
25. Sears Canada Inc.
26. Seritage Growth Properties
27. Verizon Communications Inc.
28. Dune Real Estate Partners LLC
29. Dune Real Estate Partners II LLC
30. Bridge Street Real Estate Fund 1998
31. Bridge Street PEP Technology Fund 2000, LP
32. Stone Street PEP Technology Fund 2000, LP
33. Paulson Advantage LP
34. Sears Holding Corp. Warrants
35. Sears Holdings Corp. Bond
36. Concentrated Growth Equity Fund - Jackson Square Partners
37. Omega Multi-Market Hedge Fund
38. Oz Multi-Strategy Hedge Fund
39. Goldman Sachs Direct Investment Fund 2000, L.P
40. Goldman Sachs Capital Partners 2000 Employee Fund
41. Goldman Sachs Financial Square Government Fund
42. Stormchaser Partners LLC
43. Dune Entertainment Partners LLC

Attachment B to the Ethics Agreement of Steven T. Mnuchin

1. Dune Capital Management LP
2. Dune Capital Management GP LLC
3. STM Partners LLC
4. SHM Investments LLC
5. Steven and Heather Mnuchin Foundation
6. STM GST Trust
7. AGM GST Trust
8. ETC Estate
9. ETC Foundation
10. GMG 2002 Trust
11. SMG 2002 Trust
12. LFG 2002 Trust
13. GMG 1999 Trust
14. LFG 1999 Trust
15. SMG 1999 Trust
16. NFL 2015 Trust
17. NRL 2015 Trust
18. Trust U Art 6th (b) MM
19. VM 2007 Family Trust
20. MPM 2006 Trust
21. V and MM Foundation
22. MM Insurance Trust
23. M Family Trust
24. ESL 2012 Family Trust
25. LeFrak Trust Company
26. LAPD Foundation
27. UCLA Hospital
28. Cedars-Sinai Hospital
29. MR and JM B 2003 Life Insurance Trust
30. MPM 2006 Trust
31. Crummey Trust fbo MPM
32. 2503(c) Minority Trust fbo MPM
33. Dune Entertainment Partners LLC
34. New York Presbyterian Hospital
35. Dune Capital Partners LLC
36. Dune Capital Partners II LP
37. Dune Capital Partners III LLC
38. Dune Capital Manager LLC
39. Dune Capital International Ltd.
40. SHM Partners II, LLC
41. AGM 2016 Insurance Trust
42. Stormchaser Partners LLC

From: [Deborah J. Bortot](#)
To: [Teresa L. Williamson](#)
Subject: FW: Representative Tom Price
Date: Friday, December 16, 2016 1:10:00 PM

From: Ann M Donaldson (b) (6)
Sent: Friday, December 16, 2016 12:56 PM
To: Deborah J. Bortot
Cc: James Carroll; Katja Bullock
Subject: Representative Tom Price

Good afternoon,

The Public Financial Disclosure Report (OGE-278) for Tom Price is now available for your review in *Integrity* regarding a possible nomination by the President-Elect to be Secretary of the Department of Health and Human Services.

Because Representative Price has not been formally nominated, please treat the identity and contents of the report confidentially, unless and until the Presidential Transition Team makes an official announcement.

Representative Price can be reached via Stefan Passatino of Dentons at (b) (6) .

Please begin your review of the report and coordinate with our office as soon as possible. The Presidential Transition Team contact currently assigned to this matter is Jim Carroll. Mr. Carroll can be reached at (b) (6) or by email at (b) (6) .

Thank you,

Presidential Transition Team

Ann M. Donaldson
Associate
[JONES DAY® - One Firm WorldwideSM](#)
51 Louisiana Avenue, NW
Washington, DC 20001
Office + (b) (6)

=====

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=====

From: [Sandra S. Mabry](#)
To: [Teresa L. Williamson](#)
Subject: RE: OGE Reports for Trump Nominees
Date: Monday, December 19, 2016 6:31:10 PM

I spoke to him this afternoon. Sandy

From: Teresa L. Williamson
Sent: Monday, December 19, 2016 3:14 PM
To: Sandra S. Mabry
Subject: FW: OGE Reports for Trump Nominees

HEALTH

Committee

(b) (6)

Chung Shek (chief clerk)

Liz Hackett (deputy clerk)

(b) (6)

(b) (6)

From: Shek, Chung (HELP Committee) (b) (6)
Sent: Monday, December 19, 2016 1:42 PM
To: Teresa L. Williamson
Subject: OGE Reports for Trump Nominees

Hey Teresa,

Wanted to check in to see if there was a status on the OGE reports for any of the upcoming Trump nominees. We're looking for Price, DeVos, and Puzder.

Thanks!
Chung

Referral to HHS



Referral to HHS

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Tuesday, December 27, 2016 7:49 AM
To: Hall, Randall (HHS/OGC)
Cc: Olesh, Stanley D. (HHS/OGC)
Subject: RE: Secretary report

Good morning,

Following up on my message below. Thanks!

--Patrick

From: Patrick J. Lightfoot
Sent: Thursday, December 22, 2016 8:09 AM
To: 'Hall, Randall (HHS/OGC)'
Cc: Olesh, Stanley D. (HHS/OGC)
Subject: RE: Secretary report

Hi Randy and Stan,

Just wanted to check in and see if you'd been able to touch base with the filer's representative.

Thanks!

--Patrick

Referral to HHS



From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Tuesday, December 20, 2016 4:39 PM
To: Hall, Randall (HHS/OGC)
Subject: RE: Secretary report

Randy,

Kim had mentioned you did not have the filer representative's contact information for the Secretary report. The representative's name is Stefan Passatino at Dentons. His phone number is (b) (6)

Also, the Transition Team POC is Jim Carroll, who can be reached at (b) (6) or at

(b) (6)

--Patrick

From: Patrick J. Lightfoot
Sent: Tuesday, December 20, 2016 2:13 PM
To: 'Hall, Randall (HHS/OGC)'
Subject: RE: Secretary report

Randy,

I've just submitted my first set of confirmations, questions, and edits in Integrity. There are a decent number of general comments as well as individual line item comments. One change I did make without adding a comment as I was going through was (b) (3), (5), (6)

Please let me know if you have any questions as you and the filer/filer's representative review.

Thanks!

--Patrick

Referral to HHS



From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Monday, December 19, 2016 12:58 PM
To: Hall, Randall (HHS/OGC)
Subject: RE: Secretary report

Hi Randall,

I'm in the process of doing my initial review of the report. Quick question in light of the upcoming holidays: Will you be out of the office at all over the next few weeks? If so, could you send me the contact information of your back-up reviewer in your absence?

Thanks in advance! I look forward to working with you.

All the best,

Patrick

~~

Patrick J. Lightfoot
Assistant Counsel, Ethics Law & Policy Branch
General Counsel & Legal Policy Division

U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500
Washington, DC 20005
Telephone: (202) 482-9271

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Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

From: Kimberly L. Sikora Panza
Sent: Monday, December 19, 2016 12:36 PM
To: 'Hall, Randall (HHS/OGC)'
Cc: Patrick J. Lightfoot
Subject: Secretary report

Hi Randy,

You mentioned to me that you rec'd the report for the potential nominee for Secretary, and inquired about the OGE POC. The OGE POC for this report is Patrick Lightfoot (cc:ed on this email) – his phone number is 202.482.9271.

Thanks,
Kim

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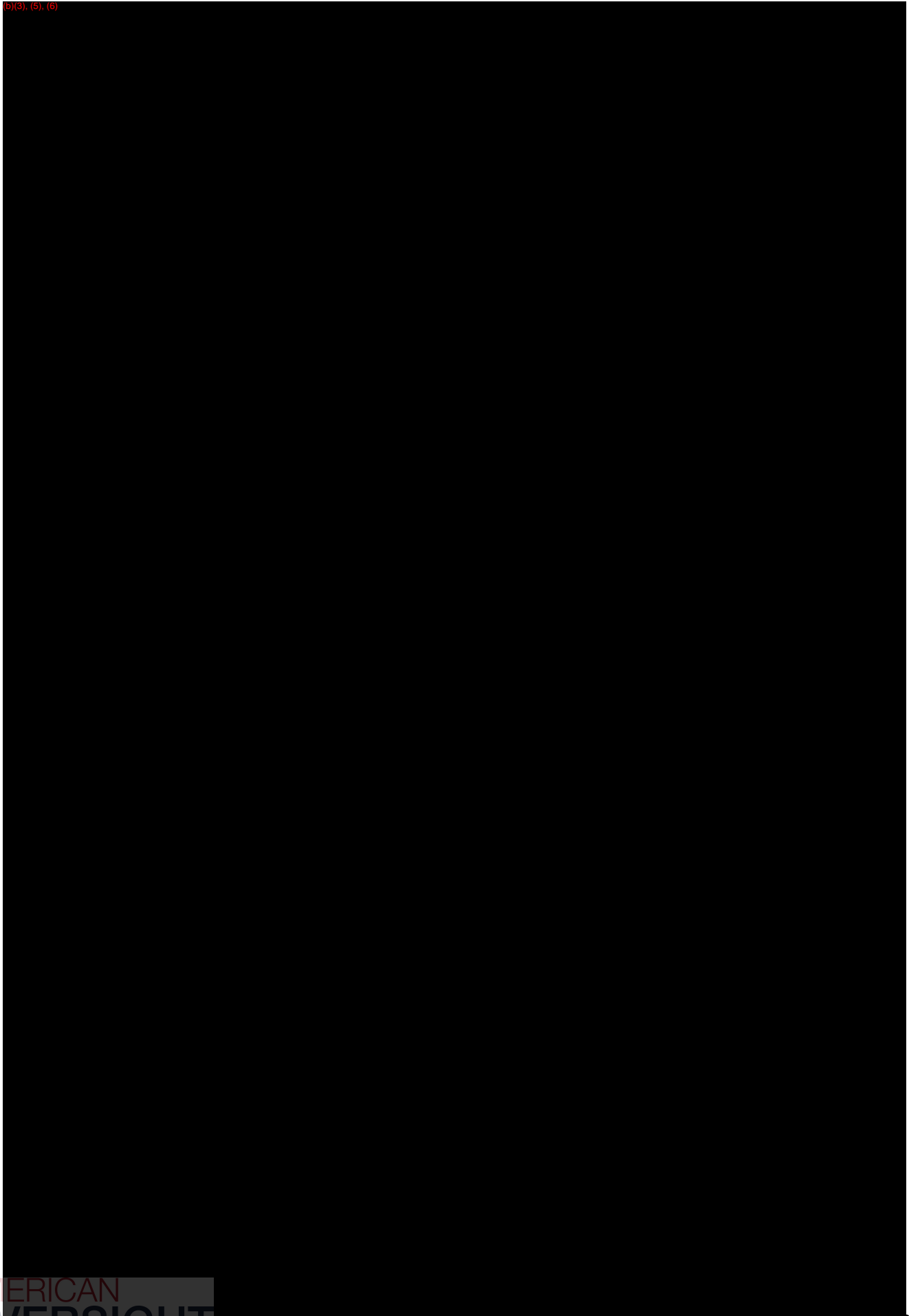
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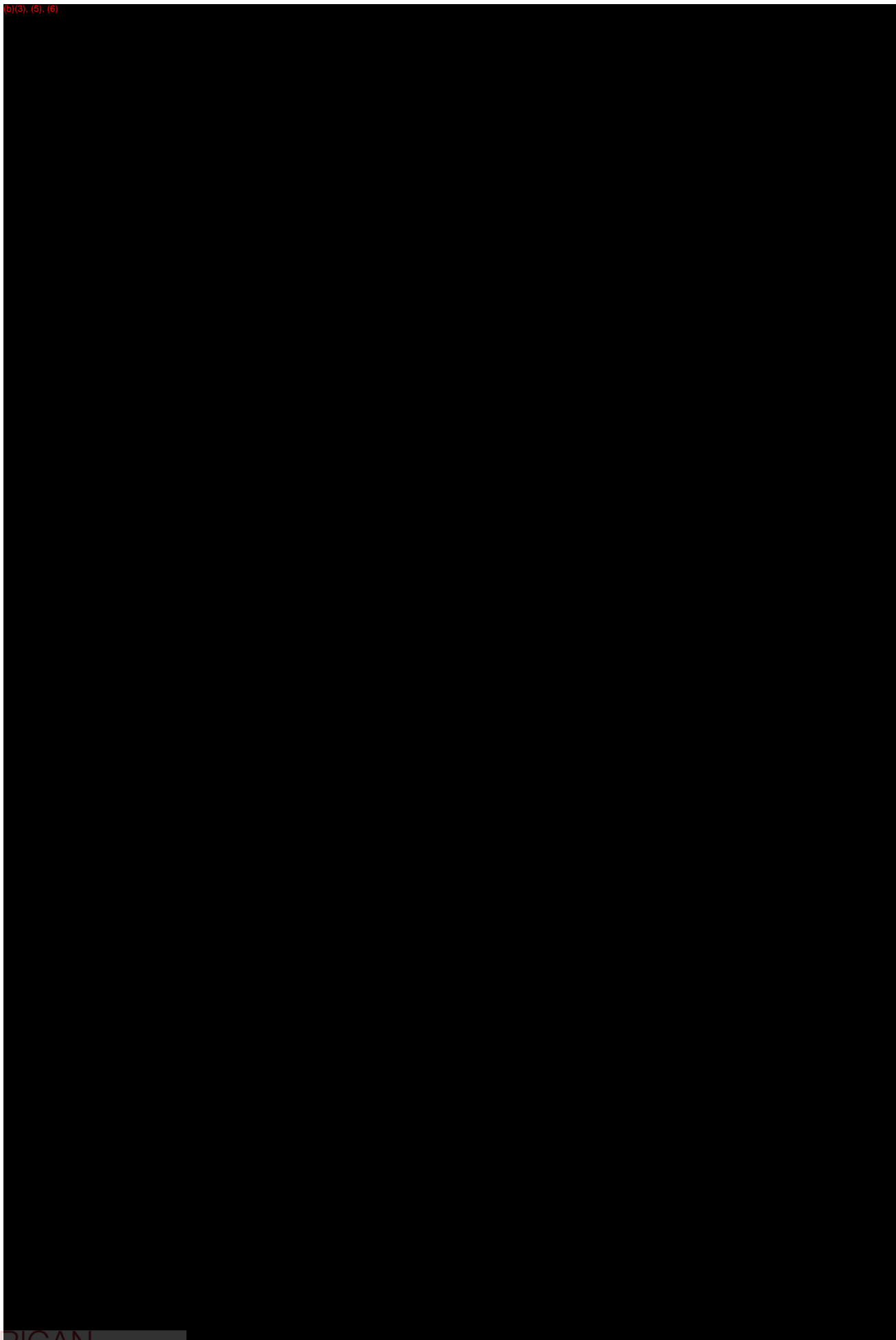
From: [Passantino, Stefan C.](#)
To: [Olesh, Stanley D. \(HHS/OGC\)](#)
Cc: [Hall, Randall \(HHS/OGC\)](#); [Fischmann, Elizabeth \(HHS/OGC\)](#); [Silbaugh, Kathleen \(HHS/OGC\)](#); [Keane, Benjamin P.](#); [Cindy Berry](#); [Patrick J. Lightfoot](#)
Subject: RE: Public Financial Disclosure Report (OGE 278e form) [DEN-US_Active.FID13145093]
Date: Thursday, December 29, 2016 4:53:01 PM
Attachments: [image001.png](#)

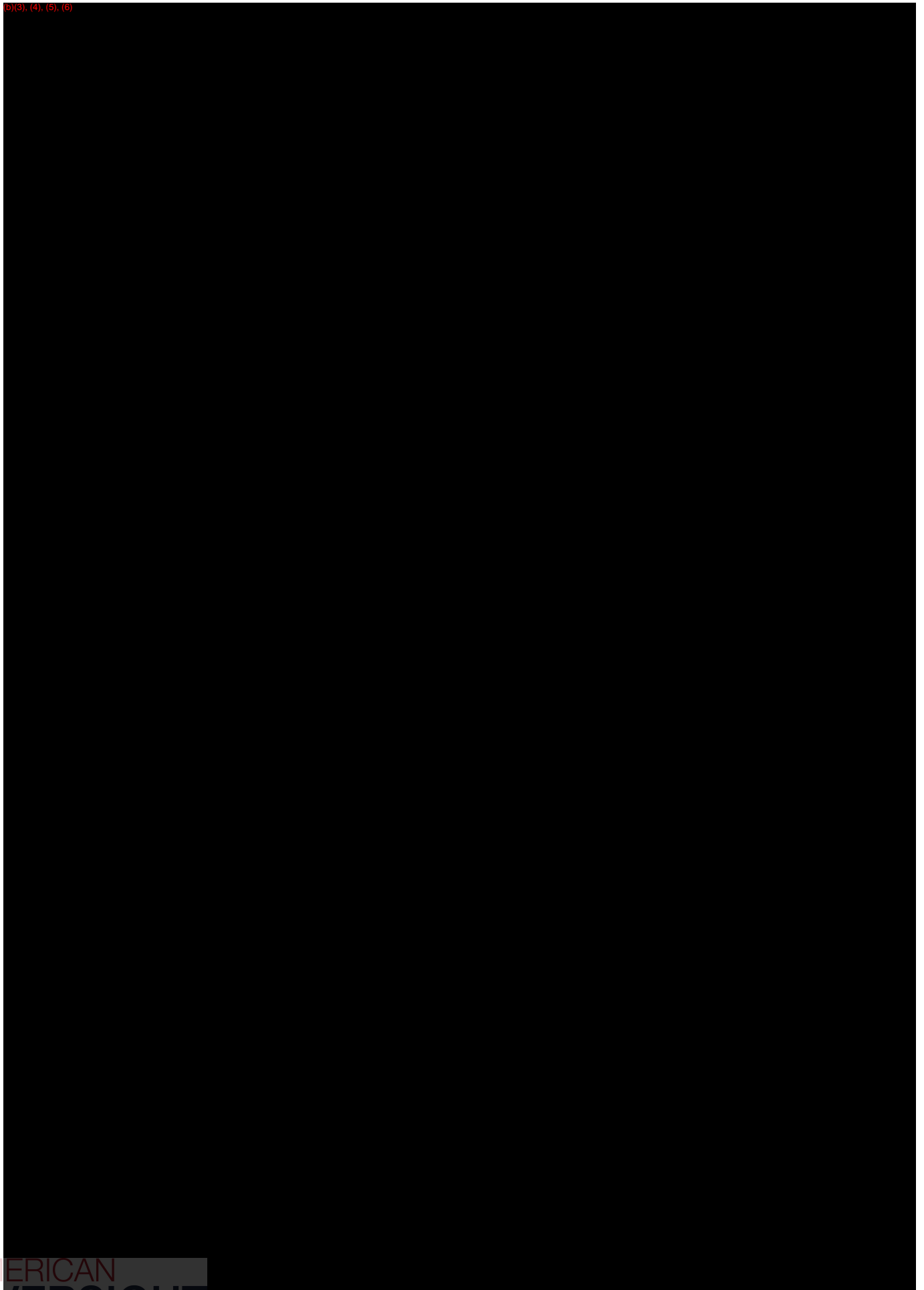
Here are the answers to your questions. As noted below, we are currently in the process of updating the 278 via the Integrity system and that process will be completed shortly (if it isn't already complete). I am available at any time to discuss question 35. Stefan.

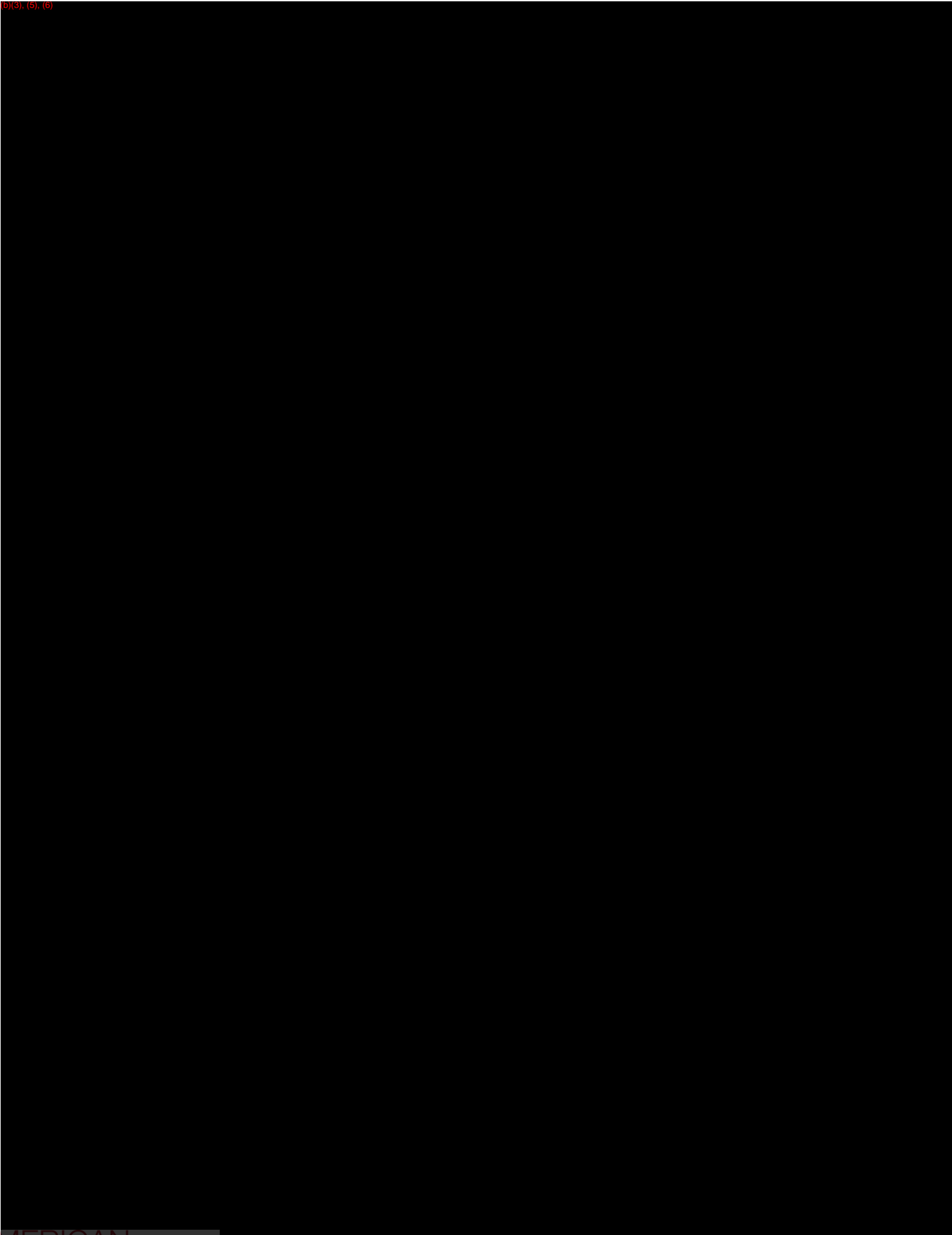
(b)(3), (5), (6)











(b)(3), (b)



Stefan C. Passantino
Partner

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M (b)(6)

Blog: www.paytoplaylawblog.com

[Bio](#) | [Blog](#) | [Website](#)

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大成 Salans FMC SNR Denton McKenna Long

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Referral to HHS

Referral to HHS

From: Passantino, Stefan C. (b) (6)
Sent: Thursday, December 29, 2016 11:32 AM
To: Olesh, Stanley D. (HHS/OGC)
Cc: Hall, Randall (HHS/OGC); Fischmann, Elizabeth (HHS/OGC); Silbaugh, Kathleen (HHS/OGC); Keane, Benjamin P.; Cindy Berry
Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Yes, my understanding was that the contact we were to be working through at HHS would be out this week and that the discussions needed to wait until the first week of January. If that is incorrect, I am available to talk now. Also copied here is Cindy Berry who is working with Dr. Price on the Transition Team.

(b) (6)
Stefan C. Passantino
Partner

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(b) (6)

Blog: www.paytoplaylawblog.com

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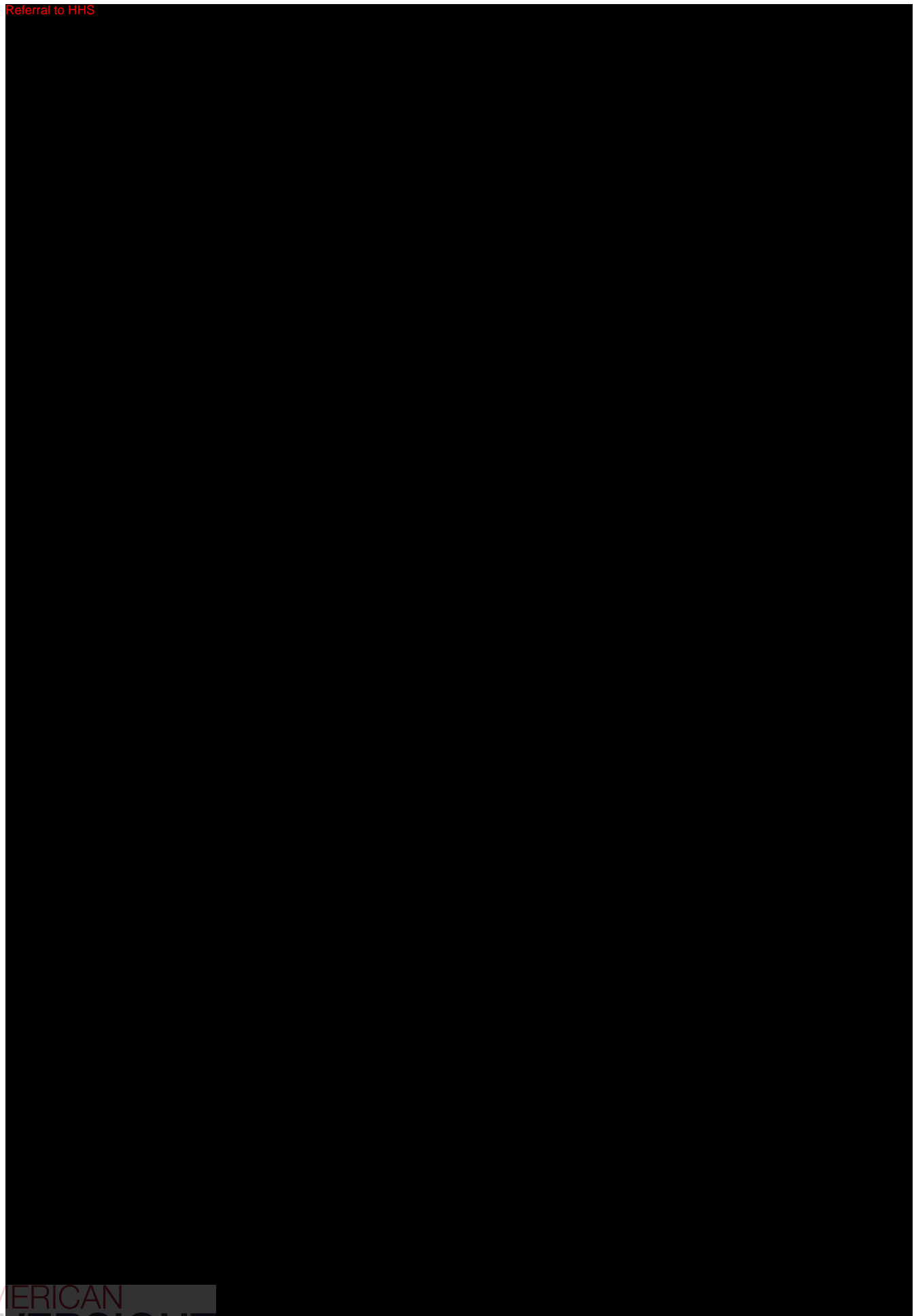
Referral to HHS

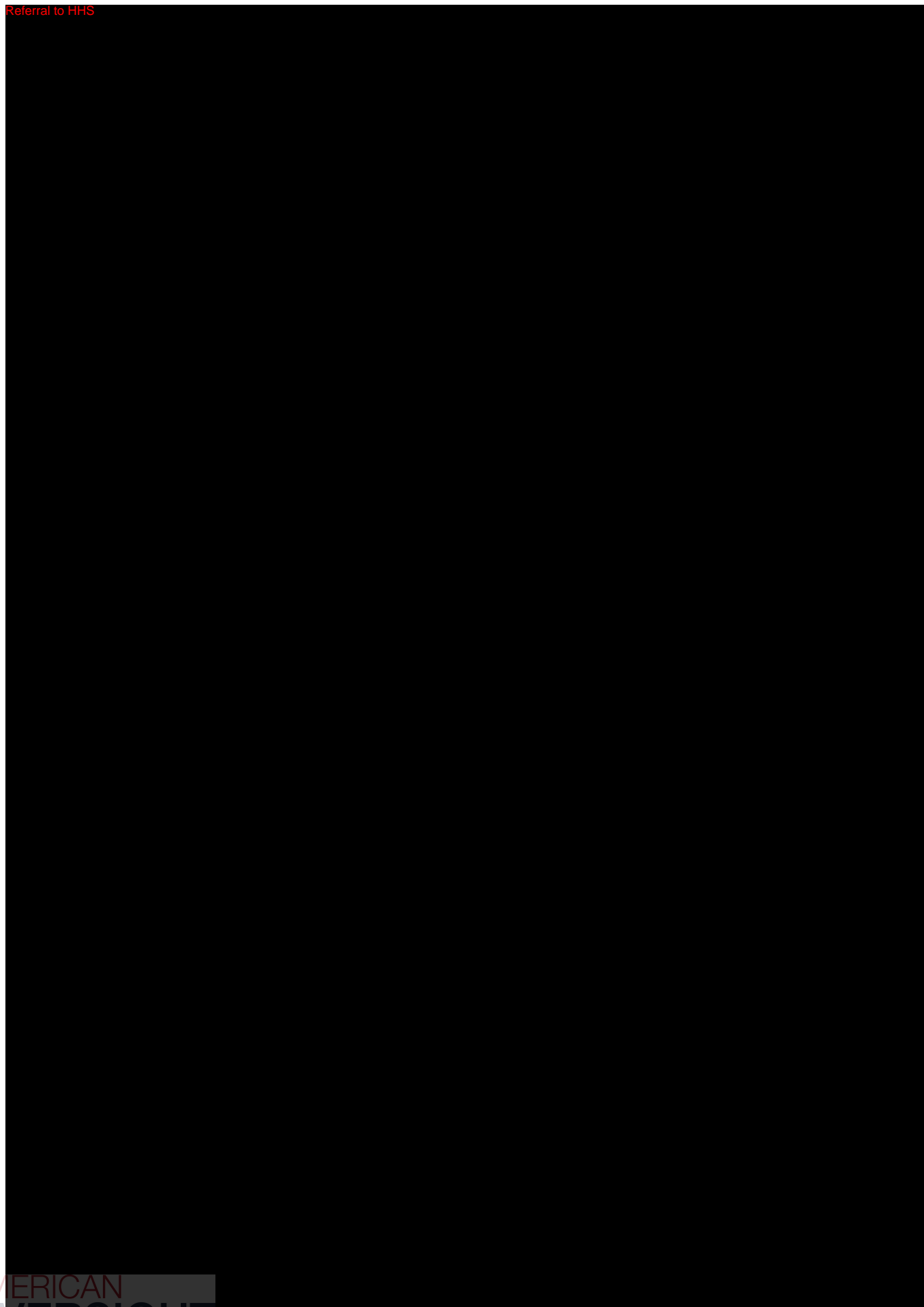
Referral to HHS



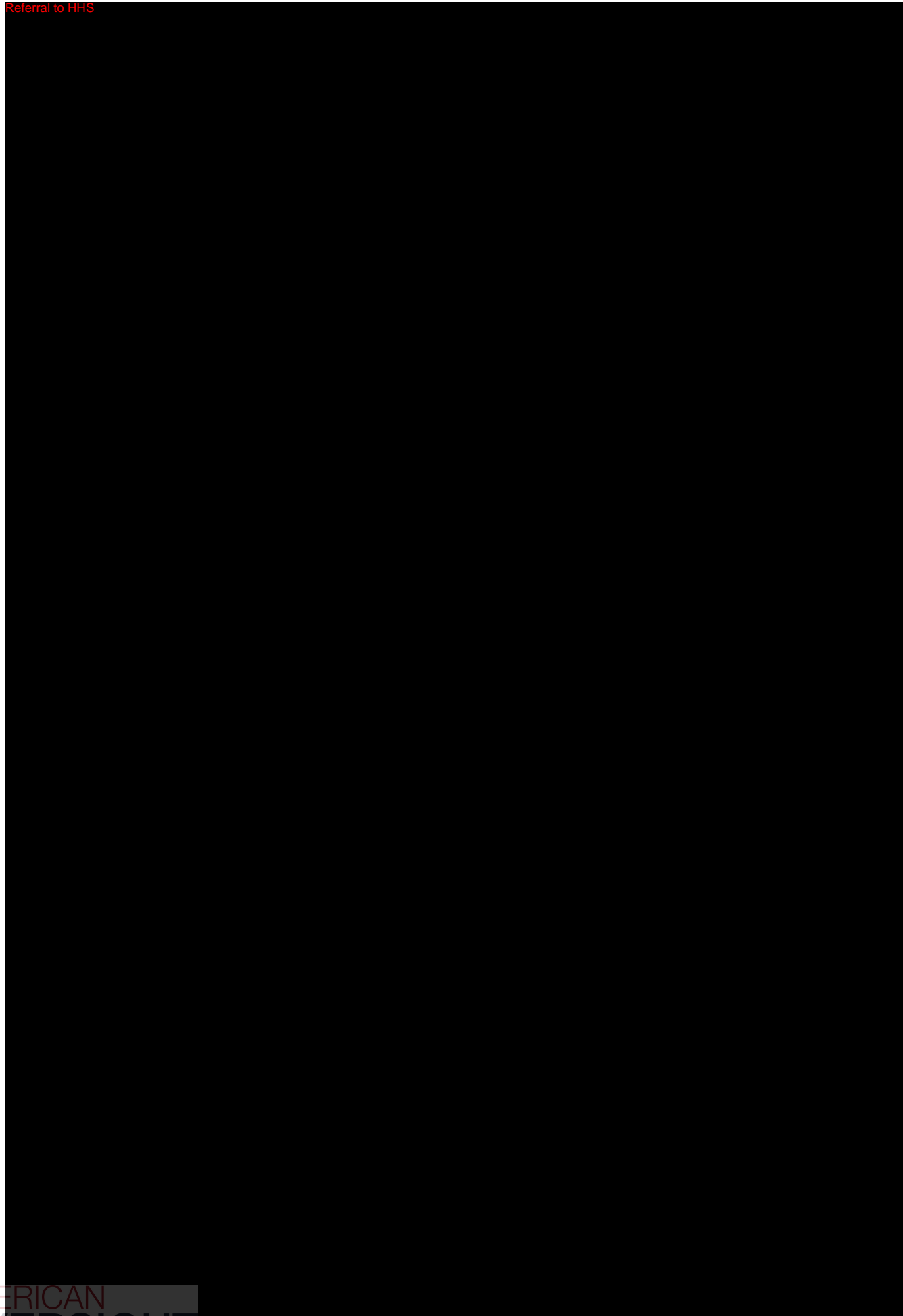
Referral to HHS












Referral to HHS



Referral to HHS



Referral to HHS



From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]

Sent: Thursday, January 05, 2017 2:39 PM

To: Olesh, Stanley D. (HHS/OGC)

Cc: Hall, Randall (HHS/OGC)

Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Wanted to follow-up on my other question re: any changes Elizabeth might suggest to the EA. I'm planning to meet with Deb and Heather in an hour or so to discuss the version I've seen.

--Patrick

Referral to HHS



From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]


Sent: Thursday, January 05, 2017 10:17 AM


To: Olesh, Stanley D. (HHS/OGC)

Cc: Hall, Randall (HHS/OGC)

Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Apologies for the confusion. I addressed everything with respect to 

 Do you have an estimate on when you'll receive comments from Elizabeth on the EA? We're hoping to go over a solid first draft of the EA towards the end of the day today (even if the Innate issue is still being worked out).

Thanks for the answers to my last set of questions! I'm going to adjust those remaining alterations to the report shortly 

(b)(3), (5), (6)

--Patrick

Referral to HHS

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Wednesday, January 04, 2017 5:11 PM
To: Olesh, Stanley D. (HHS/OGC)
Cc: Hall, Randall (HHS/OGC)
Subject: RE: Public Financial Disclosure Report (OGE 278e form)

No attachment found in search

Hi Stan,

Attached are my comments/edits to the first draft of the EA. I realize mine may overlap with some of Elizabeth's, but I altered some paragraphs to conform more closely with the EA Guide. Please let me know if you have any questions.

--Patrick

Referral to HHS

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Wednesday, January 04, 2017 2:14 PM
To: Hall, Randall (HHS/OGC); Olesh, Stanley D. (HHS/OGC)
Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Hi Randy and Stan,

Could one of you give me a call when you have a free moment? I've got two brief follow-up questions on the report and wanted to check on the status of the ethics agreement.

Thanks!

--Patrick

From: Patrick J. Lightfoot

Sent: Tuesday, January 03, 2017 9:15 AM

To: 'Olesh, Stanley D. (HHS/OGC)'

Cc: Hall, Randall (HHS/OGC); Fischmann, Elizabeth (HHS/OGC); Silbaugh, Kathleen (HHS/OGC)

Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Stan,

Will do re: the CD. I agree on the technical side and will remove the corresponding entries in Part 1 accordingly.

As we had discussed beforehand, (b)(3), (5), (6)

If you or Randy could send a draft ethics agreement my way as soon as you can (despite the open question on (b)(3), (6) that would be great.

Thanks!

--Patrick

Referral to HHS

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]

Sent: Friday, December 30, 2016 4:08 PM

To: Olesh, Stanley D. (HHS/OGC)

Cc: Hall, Randall (HHS/OGC)

Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Stan,

Hope the conversation went well; this should help nail things down some. I' ll review the overall changes in Integrity first thing Tuesday and we' ll go from there.

Have a Happy New Year!

--Patrick

From: Passantino, Stefan C. (b)(6)

Sent: Friday, December 30, 2016 3:04 PM

To: Olesh, Stanley D. (HHS/OGC)

Cc: Hall, Randall (HHS/OGC); Fischmann, Elizabeth (HHS/OGC); Silbaugh, Kathleen (HHS/OGC); Keane, Benjamin P.;

Cindy Berry; Patrick J. Lightfoot

Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Stanley, it was good speaking with you earlier today. I have had an opportunity to speak with Dr. Price and was able to confirm the issues we discussed. Specifically, I have confirmed the following:

(b)(3), (4), (5), (6)



(b) (5)



Stefan C. Passantino
Partner

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M (b) (6)

(b) (6)

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Referral to HHS

Rest of chain mentioned above

Referral to HHS



From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Thursday, January 05, 2017 2:39 PM
To: Olesh, Stanley D. (HHS/OGC)
Cc: Hall, Randall (HHS/OGC)
Subject: RE: Public Financial Disclosure Report (OGE 278e form)

Wanted to follow-up on my other question re: any changes Elizabeth might suggest to the EA. I'm planning to meet with Deb and Heather in an hour or so to discuss the version I've seen.

--Patrick

Referral to HHS

From: Passantino, Stefan C. (b) (6)

Sent: Monday, January 09, 2017 9:45 AM

To: Olesh, Stanley D. (HHS/OGC)

Cc: Fischmann, Elizabeth (HHS/OGC); Hall, Randall (HHS/OGC); Silbaugh, Kathleen (HHS/OGC); Keane, Benjamin P.; Cindy Berry; Patrick J. Lightfoot; Deborah J. Bortot; Weaver, Gretchen (NIH/OD) [E]; Caplan, Andrew (HHS/OGC)

Subject: RE: (b) (3), (b) (6)

Good morning Stanley. I tried calling about this this morning. We would all like to try to get this to a resolution today if possible. If there is someone else I can speak with regarding this matter I am in my office and available. Thank you. Stefan.

Stefan C. Passantino

Partner

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M + (b) (6)

(b) (6)

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[Bio](#) | [Blog](#) | [Website](#)

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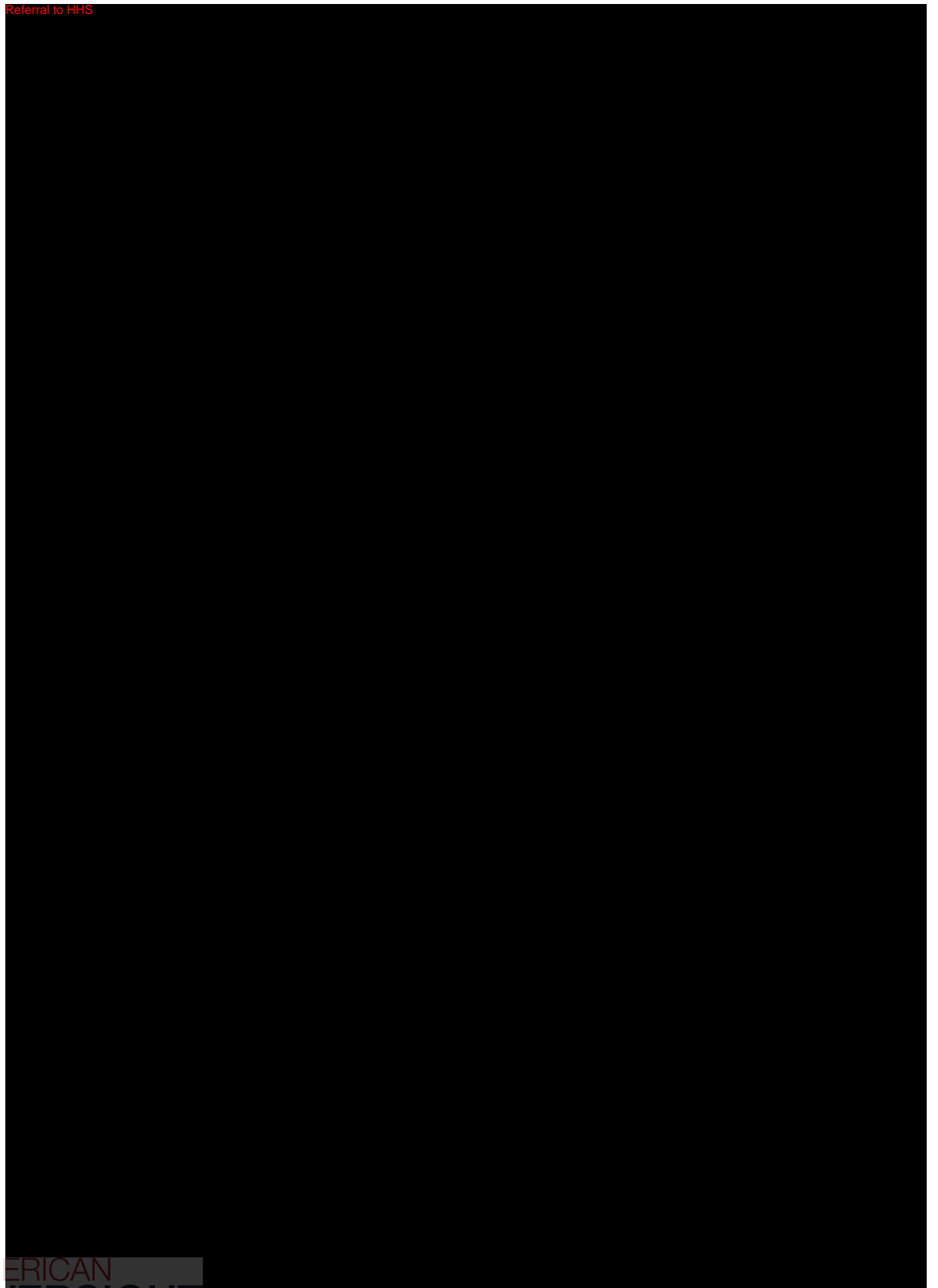
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Rest of chain mentioned above

Referral to HHS

From: Passantino, Stefan C. (b) (6)
Sent: Monday, January 09, 2017 4:36 PM
To: Olesh, Stanley D. (HHS/OGC)
Cc: Hall, Randall (HHS/OGC); Keane, Benjamin P.
Subject: RE: 278 & draft Ethics Agreement [DEN-US_Active.FID13145093]

I have spoken with Dr. Price and we will make the requested changes to the 278 referenced by Patrick Lightfoot below. With respect to Part 6 and (b) (3), (6), we will make the appropriate changes to reflect the accurate description.

(b) (3), (4), (5), (6)

Other than that, we are willing to sign this letter. Please advise whether Dr. Price is precleared by OGE. Thank you. Stefan.

 Stefan C. Passantino
Partner

(b) (6) | Fax: +1 202 496 7756

M +

(b) (6)

Blog: www.paytoplaylawblog.com

[Bio](#) | [Blog](#) | [Website](#)

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From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Monday, January 09, 2017 2:41 PM
To: Olesh, Stanley D. (HHS/OGC)
Cc: Hall, Randall (HHS/OGC)
Subject: RE: (b)(3), (6)

No attachment found in search

Stan,

As discussed, below are the remaining questions/edits to the report we had on our end:

• Part 2:

(b)(3), (5), (6)

I've also attached a revised ethics agreement with changes made to the spousal employment paragraph (and a revised signature line with the filer's full name).

Thanks!

--Patrick

Referral to HHS

Dear Senator Menendez:
Thank you for your letter of 10/10/17.
The information you provided is being reviewed.
We will contact you again once a decision has been made.
Sincerely,
Betsy DeVos

Betsy DeVos
Secretary of Education

Department of Education
400 Maryland Avenue, NE
Washington, DC 20002

Dear Senator Menendez:
Thank you for your letter of 10/10/17.
The information you provided is being reviewed.
We will contact you again once a decision has been made.
Sincerely,
Betsy DeVos

Referral to HHS

Referral to HHS

Dear Senator Menendez:
Thank you for your letter of 10/10/17.
The information you provided is being reviewed.
We will contact you again once a decision has been made.
Sincerely,
Betsy DeVos

No attachment found in search

(b)(5), (4), (6)

I am also attaching the EA in its original form, as it was made last night.
If it looks good and that for a copy, we will be happy to provide it to you.

Referral to HHS

Dear Senator Menendez:
Thank you for your letter of 10/10/17.
The information you provided is being reviewed.
We will contact you again once a decision has been made.
Sincerely,
Betsy DeVos

(b)(5), (4), (6)

Betsy DeVos
Secretary of Education

Department of Education
400 Maryland Avenue, NE
Washington, DC 20002

Dear Senator Menendez:
Thank you for your letter of 10/10/17.
The information you provided is being reviewed.
We will contact you again once a decision has been made.
Sincerely,
Betsy DeVos

Rest of chain mentioned above

From: [Passantino, Stefan C.](#)
To: [Olesh, Stanley D. \(HHS/OGC\)](#)
Cc: [Keane, Benjamin P.](#); [Hall, Randall \(HHS/OGC\)](#); [Cindy Berry](#); [Patrick J. Lightfoot](#); [Jim Carroll](#)
Subject: Re: Senate Questionnaire
Date: Wednesday, January 11, 2017 9:10:27 AM
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)

2 page attachment withheld in full - (b)(3), (4), (5), (6)

We will run this to ground and get back this morning I'm sure there is a solution here as we created both at the same time from the same source material.

Referral to HHS

From: Keane, Benjamin P. (b) (6)
Sent: Tuesday, January 10, 2017 6:38 PM
To: Olesh, Stanley D. (HHS/OGC); Passantino, Stefan C.
Cc: Hall, Randall (HHS/OGC); Cindy Berry
Subject: RE: 278 & draft Ethics Agreement [DEN-US_Active.FID13145093]

Thanks, Stan. We appreciate your efforts to push this process forward as quickly as possible and believe we've addressed all of our 278e obligations and all of your team's questions. Our hope is that we can now get the pre-clearance finalized in very short order.

As for the Senate Questionnaire, we have been informed by the Transition team that they are not authorizing it to be released. If you have questions about that decision, Cindy Berry (who is copied on this e-mail) will be your best resource for additional information.

Stefan and I continued to be available to discuss as needed.

Thanks for your assistance,
Ben

<image001.png>

Benjamin P. Keane
Managing Associate

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D (b) (6) | Fax +1 404 527 4198
ben.keane@dentons.com

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From: Keane, Benjamin P. (b) (6)
Sent: Tuesday, January 10, 2017 4:47 PM
To: Olesh, Stanley D. (HHS/OGC); Passantino, Stefan C.
Cc: Hall, Randall (HHS/OGC)
Subject: RE: 278 & draft Ethics Agreement [DEN-US_Active.FID13145093]

Stan,

We should be all set on the final item as well. Our team has cross-referenced the records against the (b)(3), (b) info and checked/unchecked the appropriate boxes in the system. Just a few minor changes, but we should be all set to push this thing forward.

Thanks,
Ben

<image001.png>

Benjamin P. Keane
Managing Associate

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Referral to HHS

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Rest of chain mentioned above

A very large rectangular black box redacting the entire third section of the document, extending from the top of the section down to the footer.

From: [Patrick J. Lightfoot](#)
To: [Heather A. Jones](#)
Subject: RE: Representative Tom Price
Date: Wednesday, January 11, 2017 1:27:59 PM

Thanks!

-----Original Message-----

From: Heather A. Jones
Sent: Wednesday, January 11, 2017 1:27 PM
To: Patrick J. Lightfoot; Teresa L. Williamson
Subject: Fw: Representative Tom Price

Please see below

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Original Message

From: Ann M Donaldson (b) (6)
Sent: Wednesday, January 11, 2017 1:21 PM
To: Deborah J. Bortot; Heather A. Jones
Subject: Representative Tom Price

On behalf of the President-Elect, this email serves as confirmation that the President-Elect intends to nominate Representative Tom Price to be Secretary of Health and Human Services. Please transmit his pre-cleared 278 report to the appropriate Senate committee.

Ann M. Donaldson
Associate
JONES DAY® - One Firm Worldwide
51 Louisiana Avenue, NW
Washington, DC 20001
Office +1 (b) (6)

From: [Passantino, Stefan C.](#)
To: [Olesh, Stanley D. \(HHS/OGC\)](#); [Keane, Benjamin P.](#)
Cc: [Fischmann, Elizabeth \(HHS/OGC\)](#); [Hall, Randall \(HHS/OGC\)](#); [Cindy Berry](#); [Patrick J. Lightfoot](#)
Subject: RE: PRECLEARED: Thomas Price
Date: Wednesday, January 11, 2017 4:09:12 PM
Attachments: [image001.png](#)

Yes. I believe it is signed. Let me see and get right back.

 Stefan C. Passantino
Partner

D  | Fax: +1 202 496 7756

M 

Blog: www.paytoplaylawblog.com

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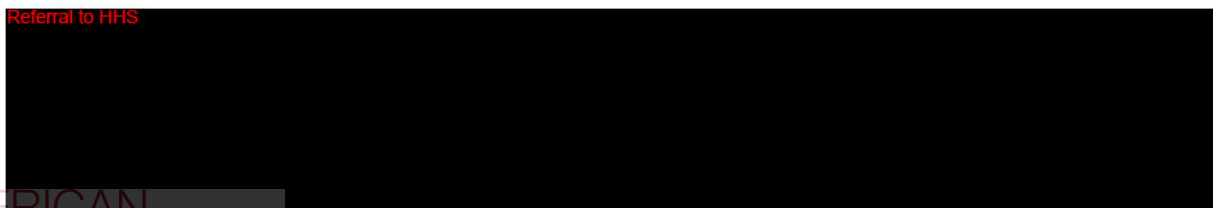
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From: Passantino, Stefan C. (b) (6)
Sent: Wednesday, January 11, 2017 2:52 PM
To: Olesh, Stanley D. (HHS/OGC); Keane, Benjamin P.
Cc: Fischmann, Elizabeth (HHS/OGC); Hall, Randall (HHS/OGC); Cindy Berry; Patrick J. Lightfoot
Subject: RE: PRECLEARED: Thomas Price

Thank you. I very much appreciate the professionalism of the entire HHS staff and you in particular. I will get you an answer as to how we get you the letter.

(b) (6)
Stefan C. Passantino
Partner

D (b) (6) | Fax: +1 202 496 7756

M (b) (6)

Blog: www.paytoplaylawblog.com

[Bio](#) | [Blog](#) | [Website](#)

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Referral to HHS

From: Patrick J. Lightfoot
Sent: Wednesday, January 11, 2017 12:23 PM
To: 'Ann M Donaldson'
Cc: Hall, Randall (HHS/OGC); Fischmann, Elizabeth (HHS/OGC); Olesh, Stanley D. (HHS/OGC)
Subject: RE: PRECLEARED: Thomas Price

No attachment found in search

Annie,

Mr. Price's draft ethics agreement is attached.

Sincerely,

--

Patrick J. Lightfoot
Assistant Counsel, Ethics Law & Policy Branch
General Counsel & Legal Policy Division

U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500
Washington, DC 20005
Telephone: (202) 482-9271

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics

From: Deborah J. Bortot
Sent: Wednesday, January 11, 2017 12:21 PM
To: 'Ann M Donaldson'
Cc: Patrick J. Lightfoot; David J. Apol; Heather A. Jones; Sandra S. Mabry; Keith Labedz; Teresa L. Williamson; Rodrick T. Johnson; Emory A. Rounds III; Hall, Randall (HHS/OGC); 'Fischmann, Elizabeth (HHS/OGC)'
Subject: PRECLEASED: Thomas Price

Annie, Thomas Price is precleared.

Patrick, please forward the ethics agreement to Annie.

Thanks!

Deb

Deborah J. Bortot
Chief, Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9227
Facsimile: (202) 482-9237

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From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]
Sent: Wednesday, January 11, 2017 6:01 PM
To: Olesh, Stanley D. (HHS/OGC)
Subject: RE: FW: PRECLEARED: Thomas Price

Stan,

What's a good number to reach you at? I tried the number you called me on earlier but it said the mailbox wasn't in service.

--Patrick

Referral to HHS

From: Kris Skrzycki [mailto:kskrzycki@gmail.com]
Sent: Wednesday, January 11, 2017 4:23 PM
To: Passantino, Stefan C.; Olesh, Stanley D. (HHS/OGC)
Cc: Keane, Benjamin P.; Cindy Berry
Subject: Re: FW: PRECLEARED: Thomas Price

Stanley, I have a signed copy of the Pre-Clearance letter. I can have it scanned and sent. Who should it be emailed to?

On Wed, Jan 11, 2017 at 4:11 PM, Passantino, Stefan C. <(b) (6)> wrote:

Kris, can you please coordinate and resolve HHS's sense of urgency below? I think this is just logistics.

 **Stefan C. Passantino**
Partner

D (b) (6) | Fax: [+1 202 496 7756](tel:+12024967756)
M (b) (6)

Referral to HHS



From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]
Sent: Wednesday, January 11, 2017 7:17 PM
To: Fischmann, Elizabeth (HHS/OGC); Olesh, Stanley D. (HHS/OGC)
Subject: RE: Pre-Clearance Letter - Price - HHS

When opening the report, there should be an option to “Sign” the report. After clicking Sign, check the certification that the report is accurate and complete, then scroll to the bottom of the page to click Submit.

If there is a number where we can reach you to walk you through the steps over the phone, we would be happy to do so.

From: tom price (b) (6)
Sent: Wednesday, January 11, 2017 6:58 PM
To: Olesh, Stanley D. (HHS/OGC)
Cc: Kris Skrzycki; Patrick J. Lightfoot; Passantino, Stefan C.; Keane, Benjamin P.; Cynthia Berry
Subject: Re: Pre-Clearance Letter - Price - HHS

278e complete and submitted

Referral to HHS



From: tom price [mailto:(b) (6)]

Sent: Wednesday, January 11, 2017 5:57 PM
To: Kris Skrzycki; Olesh, Stanley D. (HHS/OGC); pjlightf@oge.gov
Cc: Passantino, Stefan C.; Keane, Benjamin P.; Cynthia Berry
Subject: Re: Pre-Clearance Letter - Price - HHS

I thought a pdf was not acceptable.

Is that not true?

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Kris Skrzycki
Sent: Wednesday, January 11, 2017 4:36 PM
To: [REDACTED]; pjlightf@oge.gov
Cc: Passantino, Stefan C.; Keane, Benjamin P.; Cynthia Berry; tom price
Subject: Pre-Clearance Letter - Price - HHS

Final EA released below

Attached is a pre-clearance letter/ethics agreement signed by Dr. Price, nominee for Secretary of Health and Human Services.

Kris

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From: [Deborah J. Bortot](#)
To: [Teresa L. Williamson](#)
Cc: [Sandra S. Mabry](#)
Subject: FW: Final DAEO Letter and Ethics Agreement for Dr. Thomas E. Price
Date: Wednesday, January 11, 2017 7:55:58 PM
Attachments: [DAEO Ltr to OGE Dr. Thomas E. Price FINAL 1.11.17.pdf](#)
[Ethics Agreement Dr. Thomas E. Price FINAL 1.11.17.pdf](#)

DAEO letter referred to HHS; Final ethics agreement released below

Referral to HHS

From: [Teresa L. Williamson](#)
To: [Sandra S. Mabry](#)
Subject: FW: OGE Reports
Date: Thursday, January 12, 2017 11:05:31 AM

Hi Sandy, See Chung's email below. I figure we have one voice from OGE to the committee on questions on the status of reports and I'm assuming that's your voice☺ Let me know if I should be calling, I'd be happy to do so.

Thanks
Teresa

From: Shek, Chung (HELP Committee) (b) (6)
Sent: Thursday, January 12, 2017 11:03 AM
To: Teresa L. Williamson
Subject: OGE Reports

Hey Teresa,

Are there any updates as to when we might be getting OGE reports for Price, (b) (6) ?

Thanks!
Chung

From: [Sandra S. Mabry](#)
To: ["Ann M. Donaldson"](#)
Subject: FW: Public Financial Disclosure Report of Thomas E. Price
Date: Thursday, January 12, 2017 7:12:21 PM
Attachments: [Price, Thomas E. final278.pdf](#)
[Price, Thomas E. finalEA.pdf](#)
[Price, Thomas E. finalsenateltr-HELP--.docx.pdf](#)

Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Annie,

Yesterday we sent the documents for Dr. Price to the Senate Finance Committee, the committee that handles the nomination for the Secretary of Health and Human Resources. With the email below, we have transmitted the package to the Committee on Health, Education, Labor, and Pensions, consistent with long-time practice. If you have any questions, please call me at 202-482-9258 or Deb at 202-482-9277. Thanks, Sandy

From: Sandra S. Mabry
Sent: Thursday, January 12, 2017 7:01 PM
To: 'Chung_Shek@help.senate.gov'
Cc: Deborah J. Bortot; Teresa L. Williamson; Rodrick T. Johnson; Heather A. Jones; 'Ann M. Donaldson'
Subject: Public Financial Disclosure Report of Thomas E. Price

Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Good Evening,

I've attached the financial disclosure package for Thomas E. Price. President-Elect Trump has announced his intention to nominate Dr. Price for the position of Secretary, Department of Health and Human Services.

The hard copy of the attached documents will be placed at OGE reception for pick up by a Senate rider page per our agreement. If you have any questions, please contact Teresa Williamson @ 202-482-9283.

Please respond to this message to confirm receipt of the attached package, and please let me know in your response whether you will send a Senate rider page.

Thanks!

Sandra Mabry
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9258

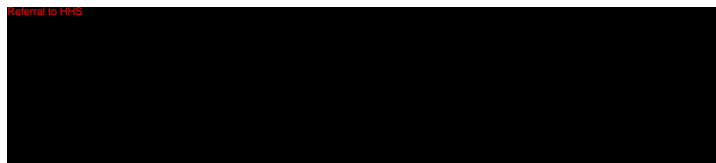
From: [Patrick J. Spillane](#)
To: [Hill, Benjamin P](#)
Subject: RE: Form 278e - Update Letter for the OGE File of Dr. Tom Price
Date: Tuesday, January 31, 2017 7:51:00 AM
Attachments: [image001.png](#)

Hi Randy,

Just wanted to follow up and see if you'd heard back from the filer's attorney.

Thanks!

--Patrick



From: Keane, Benjamin P [mailto:[b.keane@denon.us](#)]
Sent: Monday, January 23, 2017 3:19 PM
To: Hill, Benjamin P (HHS-OIG)
Subject: FW: Form 278e - Update Letter for the OGE File of Dr. Tom Price

Randy,

Thanks for confirming receipt of this document over the phone for me this afternoon. I have a second to send an e-mail confirmation of receipt as well if it would be much appreciated. Sorry to ask you to do that, but I'd feel better having written documentation for my records moving forward.

Thanks again and have a great day,
Ben

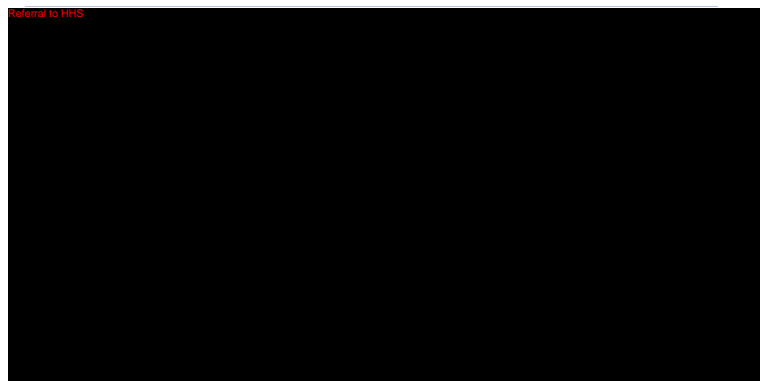
Benjamin P. Keane
Managing Associate

D | [\(313\) 612-1100](#) | Fax: 1 202 967 7756
M | [\(313\) 612-1100](#) | Fax: 1 202 967 1988
E | [b.keane@denon.us](#)

Denon US LLP
1900 K Street, NW, Washington, DC 20006
303 Peachtree Street, NE, Atlanta, GA 30308

大誠 Salans FMC SNR Denon McKenna Long

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From: [Patrick J. Lightfoot](#)
To: ["Fischmann, Elizabeth \(HHS/OGC\)"; "Hall, Randall \(HHS/OGC\)"](#)
Subject: Update on Price Report
Date: Tuesday, January 31, 2017 12:44:35 PM

Hi Elizabeth and Randy,

In light of Congressman Price's testimony at his confirmation hearing that (b)(3), (5), (6)

[REDACTED]

[REDACTED]

Please feel free to forward those portions above to him/his attorney and send any response you receive my way. Thank you!

--Patrick

From: [Patrick J. Lightfoot](#)
To: ["Olesh, Stanley D. \(HHS/OGC\)"](#)
Cc: ["Hall, Randall \(HHS/OGC\)"; Patrick Shepherd](#)
Subject: RE: ADVANCE -- Price CD request
Date: Wednesday, February 01, 2017 10:47:44 AM

Stan,

I spoke with the head of our CD program and it appears that the best course of action will be to wait until we've resolved the remaining questions surrounding the amendment of the 278 and EA before moving forward with a CD review in case anything needs to be adjusted on that front. Once we're all clear there, we can start the review of the CD.

--Patrick

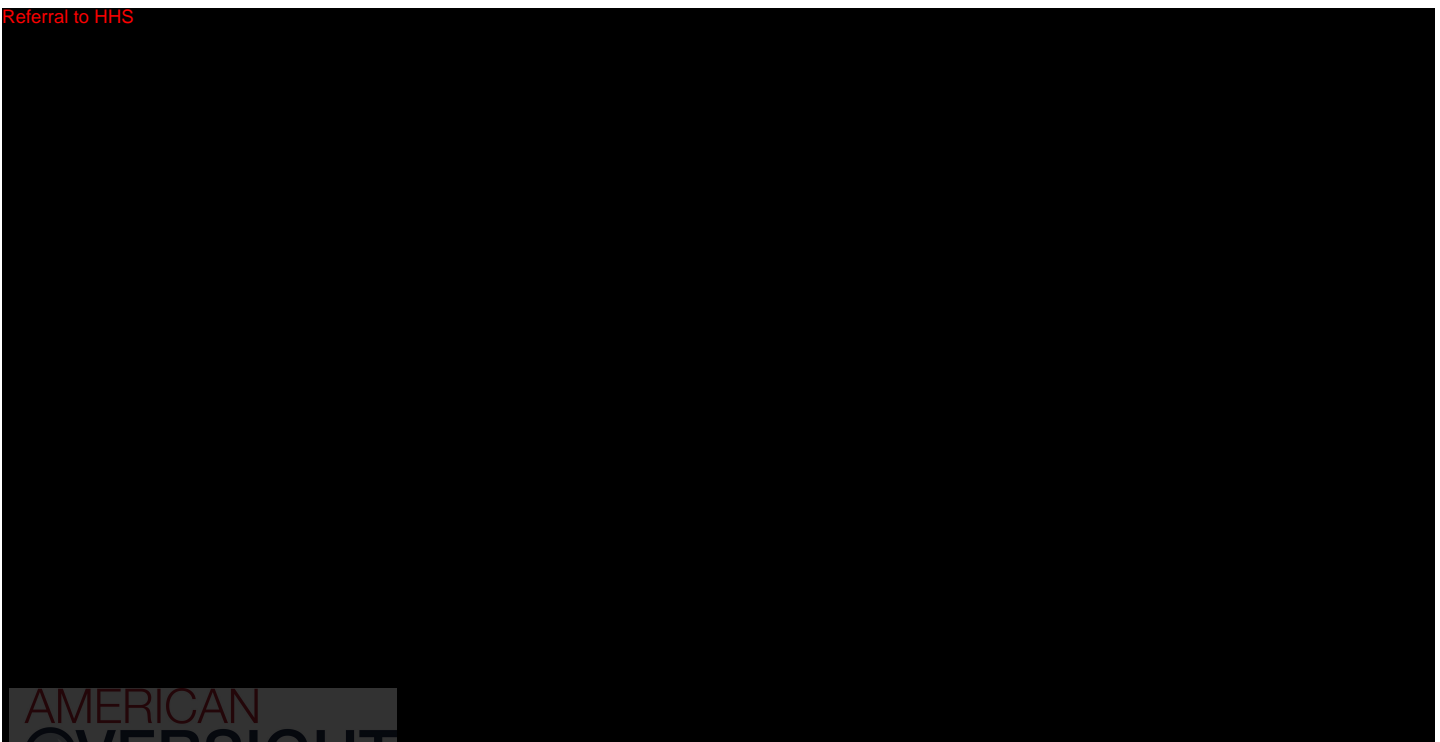
From: Patrick J. Lightfoot
Sent: Tuesday, January 31, 2017 12:51 PM
To: 'Olesh, Stanley D. (HHS/OGC)'
Cc: 'Hall, Randall (HHS/OGC)'
Subject: RE: ADVANCE -- Price CD request

Hi Stan,

I can forward this to the manager of our CD program (which might result in the CD being assigned to me anyway), but I'd note that we're still trying to work out the amendment letter and corresponding changes to the ethics agreement, which would prevent the CD from being complete until those are done. I believe Randy was trying to get in touch with his attorney when we spoke about it on Thursday.

--Patrick

Referral to HHS



Referral to HHS



Referral to HHS

From: Keane, Benjamin P. (b) (6)
Sent: Wednesday, February 01, 2017 1:33 PM
To: Hall, Randa I (HHS/OGC)
Cc: Olesch, Stanley D. (HHS/OGC); Fischmann, Elizabeth (HHS/OGC)
Subject: RE: Fo m 278e - Update Letter to the OGE File of D. Tom P. ice
Importance: High

Randy,

Thank you for your time today (b) (3), (4), (5), (6).

Thanks in advance for your assistance. Should you have any questions or concerns, please do not hesitate to let me know.
Ben

Benjamin P. Keane

D: (b) (6) | Fax: 1 202 496 7756
C: (b) (6) | Fax: 1 404 527 4198
(b) (6)

Dentons US LLP
1900 K Street, NW, Washington, DC 20006
303 Peachtree Street, NE, Atlanta, GA 30308

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Referral to HHS

From: Keane, Benjamin P. (b) (6)
Sent: Monday, January 23, 2017 1:15 PM
To: Hall, Randa I (HHS/OGC)
Subject: FW: Fo m 278e - Update Letter to the OGE File of D. Tom P. ice

Randy,

Thanks for confirming receipt of this document over the phone for me this afternoon. If you have a second to send an email confirmation of receipt as well it would be much appreciated. So I can ask you to do that, but I'd feel better having written documentation for my records moving forward.

Thanks again and have a great day,
Ben

Benjamin P. Keane

Managing Associate

D: (b) (6) | Fax: 1 202 496 7756
C: (b) (6) | Fax: 1 404 527 4198
(b) (6)

Dentons US LLP
1900 K Street, NW, Washington, DC 20006
303 Peachtree Street, NE, Atlanta, GA 30308

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From: Keane, Benjamin P.
Sent: Sunday, January 22, 2017 11:14 PM
To: Hall, Randa I (HHS/OGC); (b) (3), (6)
Subject: Fo m 278e - Update Letter to the OGE File of D. Tom P. ice

Randy,

I hope all is well. The attached letter issues on behalf of D. Tom P. ice - nominee to serve as Secretary of the U.S. Department of Health and Human Services. As per our previous conversations and your verbal guidance, please find attached for inclusion in the file of D. P. ice a copy of an update letter that notes a small number of minor administrative edits that should be made to the Fo m 278e previously submitted through your office. Thanks in advance for your time and assistance as it relates to this matter, and please let us know if you require any additional information.
Have a great day,
Ben

Benjamin P. Keane

Managing Associate

D: (b) (6) | Fax: 1 202 496 7756
C: (b) (6) | Fax: 1 404 527 4198
(b) (6)
New | benjamin.keane@dentons.com | dentons.com
Assistant: Ada Oppengren | 1 202 496 7152

Dentons US LLP
1900 K Street, NW, Washington, DC 20006
303 Peachtree Street, NE, Atlanta, GA 30308

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No attachment found in search

Referral to HHS



From: Keane, Benjamin P. (b) (6)
Sent: Thursday, February 02, 2017 11:22 AM
To: Hall, Randall (HHS/OGC)
Cc: Olesh, Stanley D. (HHS/OGC); Fischmann, Elizabeth (HHS/OGC)
Subject: RE: Questions for Dr. Price
Importance: High

Randy,

Thanks for your assistance with these matters. Please find below the nominee's responses to both inquiries.

Sincerely,
Ben Keane

(b)(3), (5), (6)



Referral to HHS



Referral to HHS



Referral to HHS



Referral to HHS

From: Patrick J. Lightfoot [mailto:pjl@hhs.gov]
Sent: Tuesday, February 07, 2017 1:38 PM
To: Hal Randai (HHS/OGC); Deborah J. Bortol; Heather A. Jones
Cc: Olesh Stanley D. (HHS/OGC); Fischmann Elizabeth (HHS/OGC)
Subject: RE: Amendment Letter

Thanks Randy! Now we just need the cover letter from Elizabeth.

Referral to HHS

From: Keane Benjamin P. (b) (6)
Sent: Tuesday, February 07, 2017 1:22 PM
To: Hal Randai (HHS/OGC)
Cc: Olesh Stanley D. (HHS/OGC); Fischmann Elizabeth (HHS/OGC)
Subject: RE: Amendment Letter
Importance: High

No attachment found in search

Randy,

Please find attached a signed copy of the Ethics Agreement Amendment letter. The original version will be hand delivered to your offices.

Thanks,
Ben

Benjamin P. Keane

D (b) (6) | Fax 1 202 96 7756
O (b) (6) | Fax 1 0 627 198
M (b) (6)

Dentons US LLP
1900 K Street, NW, Washington, DC 20006
303 Peachtree Street, NE, Atlanta, GA 30308

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Referral to HHS

From: Deborah J. Bortol [mailto:dbortol@hhs.gov]
Sent: Tuesday, February 07, 2017 11:36 AM
To: Hal Randai (HHS/OGC); Heather A. Jones
Cc: Fischmann Elizabeth (HHS/OGC)
Subject: RE: Amendment Letter

2 page attachment withheld in full - (b)(3), (4), (5), (6)

Randy

(b) (6) provide the filer with the attached letter.

Thanks
Deb

Referral to HHS

From: Keane Benjamin P. (b) (6)
Sent: Monday, February 06, 2017 3:17 PM
To: Hal Randai (HHS/OGC)
Cc: Olesh Stanley D. (HHS/OGC); Fischmann Elizabeth (HHS/OGC)
Subject: Amendment Letter

Thanks for the letter, Randy, and for the low-up conversation on these issues. We are generally comfortable with all the language in the amendment. The only requested change we would ask OGE to consider is to tweak the last sentence on pg. 1 to read as follows:

(b) (6)

If you believe OGE would be amenable to that small change, please pass it along to them and we can sign a new version once it is completed. If you don't believe they would be willing to make that change, please comment that as well.

Thanks for your assistance,
Ben

Benjamin P. Keane

D (b) (6) | Fax 1 202 96 7756
O (b) (6) | Fax 1 0 627 198
M (b) (6)

Dentons US LLP
1900 K Street, NW, Washington, DC 20006
303 Peachtree Street, NE, Atlanta, GA 30308

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Referral to HHS

From: [Patrick J. Lightfoot](#)
To: [Elaine Newton](#)
Subject: ADVANCE -- Price CD request
Date: Wednesday, February 08, 2017 8:31:52 AM
Attachments: [PriceSec-CD-ogecdtransm.doc](#)
[TEP HHS Certificate of Divestiture Request Letter.pdf](#)
[Ethics Agreement Dr. Thomas E. Price FINAL 1.11.17.pdf](#)
[Price Thomas E. final278.pdf](#)
[Price, Thomas final278EAsupplement.pdf](#)

Attachments referred to HHS; 278 not available under
FOIA; Final EA released below

Elaine,

Attached are the materials for Dr. Price's CD request. HHS is requesting a review in advance of his confirmation so that he can then send us official versions of the docs and divest ASAP.

Thanks!

--Patrick

Referral to HHS

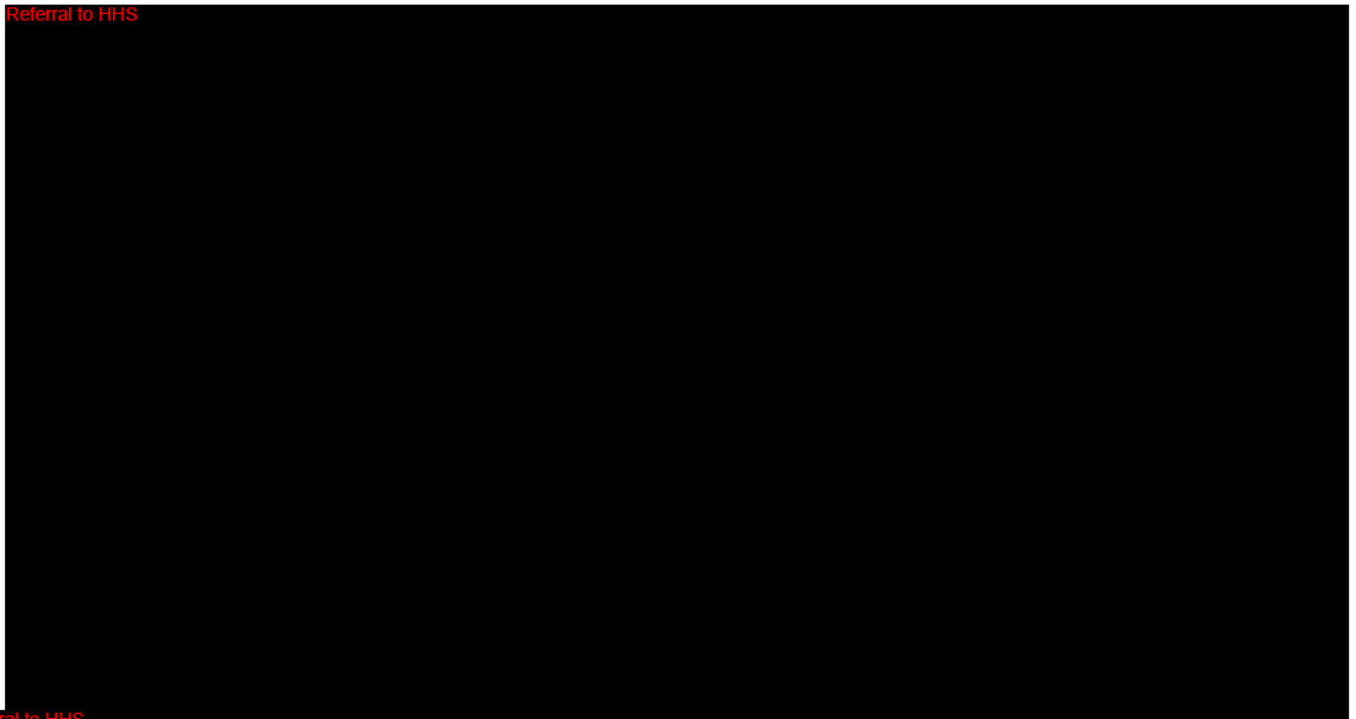
From: [Patrick J. Lightfoot](#)
To: ["Olesh, Stanley D. \(HHS/OGC\)"](#)
Cc: [Patrick Shepherd](#); [Hall, Randall \(HHS/OGC\)](#); [Fischmann, Elizabeth \(HHS/OGC\)](#)
Subject: RE: ADVANCE -- Price CD request
Date: Wednesday, February 08, 2017 12:17:24 PM

Hi Stan,

Unfortunately, there isn't a set estimate on turn-around time I can give because every CD package is different.

--Patrick

Referral to HHS



Referral to HHS



From: Patrick J. Lightfoot [<mailto:pilightf@oge.gov>]
Sent: Wednesday, February 08, 2017 8:29 AM
To: Olesh, Stanley D. (HHS/OGC)
Cc: Patrick Shepherd; Hall, Randall (HHS/OGC)
Subject: RE: ADVANCE -- Price CD request

Hi Stan,

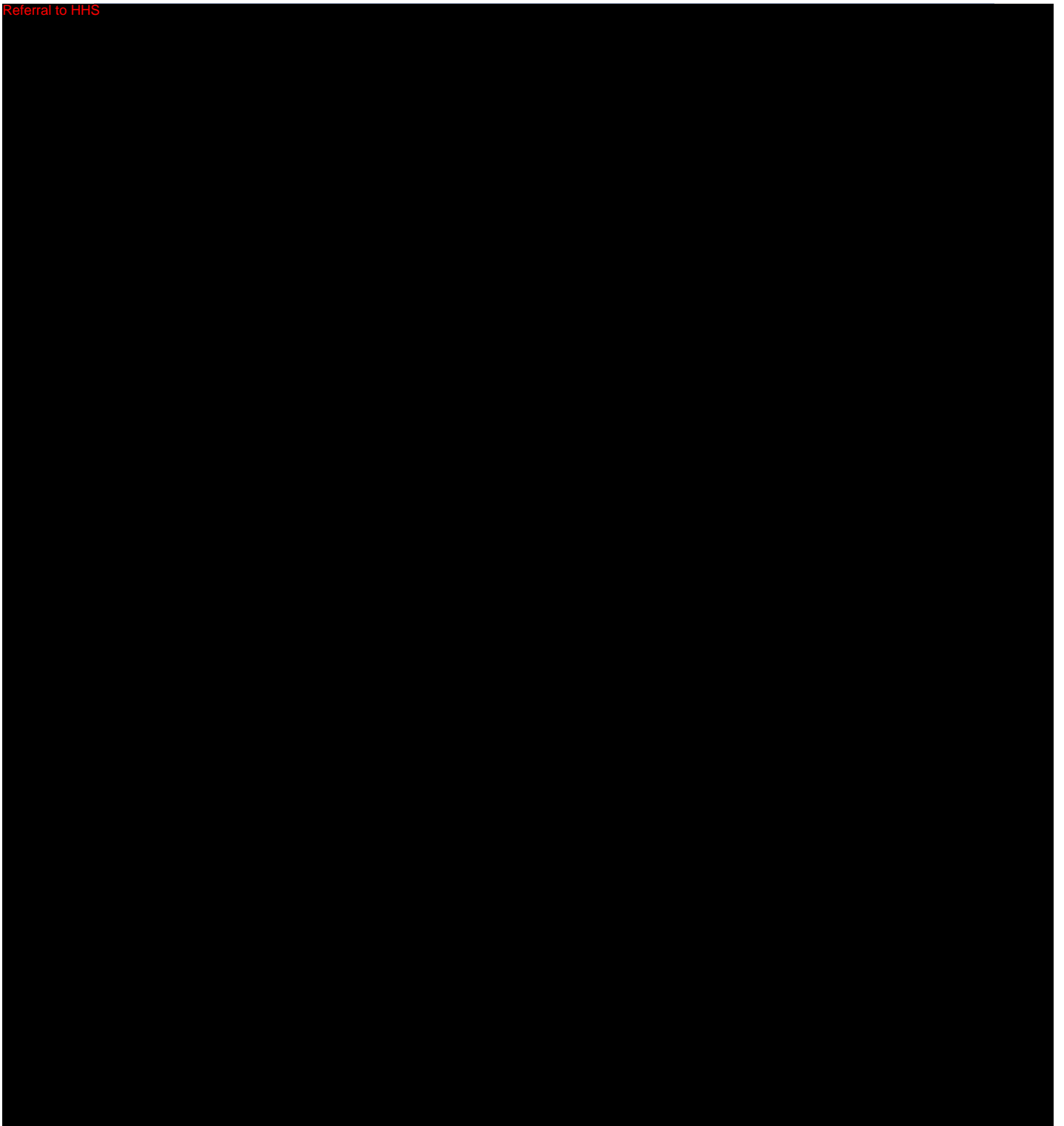
Now that we've got the signed amendment letter from Dr. Price, I'll forward the CD package for pre-

review.

Thanks!

--Patrick

Referral to HHS



From: [Teresa L. Williamson](#)
To: [Patrick J. Lightfoot](#); (b)(6) - Randall Hall's email address; (b)(6) - Olesha Stanley's email address
Subject: Amendment to Public Financial Disclosure Report of Thomas E. Price
Date: Thursday, February 09, 2017 7:57:31 AM
Attachments: [Price, Thomas finalagencyltr.pdf](#)
[Price, Thomas OGEcoverletteramendment.pdf](#)
[Price, Thomas final278EAsupplement.pdf](#)
[Price, Thomas senateAmendFINANCEltr.pdf](#)

Agency letter referred to HHS; other attachments released below

Good Morning,

The attached is an amendment to the final report that was submitted to the committee by letter dated January 11, 2017.

Thanks!

Teresa Williamson
US Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9283

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



February 8, 2017

The Honorable Orrin Hatch
Chairman
Committee on Finance
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

By letter dated January 11, 2017, the Office of Government Ethics (OGE) transmitted to the Committee the financial disclosure report and ethics agreement of Thomas E. Price in connection with his nomination for the position of Secretary, Department of Health and Human Services. Enclosed are a letter from the Department of Health and Human Services and a letter from Dr. Price amending his financial disclosure report and supplementing his ethics agreement.

Dr. Price's enclosed letter amends the following four items that he previously disclosed in his financial disclosure report: (1) "Chattahoochee Associates" ("Organization Name" and "Position Held" columns amended in Part 1, Line 2); (2) "Chattahoochee Associates" ("Description" column amended in Part 2, Line 1); (3) "Amazon Com Inc" ("Value" column amended in Part 6, Line 14.55); and (4) "Innate Immunotherapeutics Ltd." ("Income Type" and "Income Amount" columns amended in Part 6, Line 15.1). Dr. Price's enclosed letter also adds the following new line item entry that he previously omitted from his financial disclosure report: "Innate Immunotherapeutics Ltd." (stock valued at \$100,001-\$250,000 in Part 6, Line 28). Finally, the letter supplements his January 11, 2017, ethics agreement with additional commitments.

We have reviewed this additional submission and have obtained advice from the Department of Health and Human Services concerning any possible conflict in light of its functions and Dr. Price's proposed duties. Based on the information provided, OGE and the Department of Health and Human Services continue to believe that there will be no unresolved conflicts of interest between his financial interests and the duties that he will be expected to perform as Secretary.

Sincerely,

Walter M. Shaub, Jr.
Director

Enclosures



UNITED STATES OFFICE OF
GOVERNMENT ETHICS



February 7, 2017

The Honorable Lamar Alexander
Chairman
Committee on Health, Education,
Labor, and Pensions
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

By letter dated January 11, 2017, the Office of Government Ethics (OGE) transmitted to the Committee the financial disclosure report and ethics agreement of Thomas E. Price in connection with his nomination for the position of Secretary, Department of Health and Human Services. Enclosed are a letter from the Department of Health and Human Services and a letter from Dr. Price amending his financial disclosure report and supplementing his ethics agreement.

Dr. Price's enclosed letter amends the following four items that he previously disclosed in his financial disclosure report: (1) "Chattahoochee Associates" ("Organization Name" and "Position Held" columns amended in Part 1, Line 2); (2) "Chattahoochee Associates" ("Description" column amended in Part 2, Line 1); (3) "Amazon Com Inc" ("Value" column amended in Part 6, Line 14.55); and (4) "Innate Immunotherapeutics Ltd." ("Income Type" and "Income Amount" columns amended in Part 6, Line 15.1). Dr. Price's enclosed letter also adds the following new line item entry that he previously omitted from his financial disclosure report: "Innate Immunotherapeutics Ltd." (stock valued at \$100,001-\$250,000 in Part 6, Line 28). Finally, the letter supplements his January 11, 2017, ethics agreement with additional commitments.

We have reviewed this additional submission and have obtained advice from the Department of Health and Human Services concerning any possible conflict in light of its functions and Dr. Price's proposed duties. Based on the information provided, OGE and the Department of Health and Human Services continue to believe that there will be no unresolved conflicts of interest between his financial interests and the duties that he will be expected to perform as Secretary.

Sincerely,

Walter M. Shaub, Jr.
Director

Enclosures



UNITED STATES OFFICE OF
GOVERNMENT ETHICS



JAN 12 2017

The Honorable Lamar Alexander
Chairman
Committee on Health, Education,
Labor, and Pensions
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Thomas E. Price. President-Elect Trump has announced his intention to nominate Dr. Price for the position of Secretary, Department of Health and Human Services.

We have reviewed the report and have obtained advice from the agency concerning any possible conflict in light of its functions and the nominee's proposed duties. Also enclosed is an ethics agreement outlining the actions that the nominee will undertake to avoid conflicts of interest. Unless a date for compliance is indicated in the ethics agreement, the nominee must fully comply within three months of confirmation with any action specified in the ethics agreement.

Based thereon, we believe that this nominee is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

Walter M. Shaub, Jr.
Director

Enclosures

January 11, 2017

Ms. Elizabeth J. Fischmann
Associate General Counsel for Ethics
Designated Agency Ethics Official
U.S. Department of Health and Human Services
Room 710-E, Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Dear Ms. Fischmann:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Secretary, U.S. Department of Health and Human Services.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position as Managing Partner of Chattahoochee Associates LP. I will continue to have a financial interest in this entity, but I will not provide services material to the production of income. Instead, I will receive only passive investment income from it. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Chattahoochee Associates LP, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I will resign from my position as Delegate of the American Medical Association. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know the American Medical Association is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Within 90 days of my confirmation, I will divest my interests in the following entities:

AETNA Inc.
Alphabet Inc.
Amazon.com Inc.

Ms. Elizabeth J. Fischmann

Page 2

American Tower REIT
Amgen Inc.
Apple Inc.
Arch Capital Group Ltd.
Arris International PLC
Athena Health Inc.
Biogen Inc.
Bristol Myers Squibb Co.
Calpine Corp.
CBS Corp.
Cognizant Tech Solutions
Crown Castle Intl Corp.
CVS Health Corp.
DanaHER Corp.
Delta Airlines, Inc.
Eli Lilly & Co.
Facebook Inc.
Hewlett Packard, Inc.
Honeywell Corp.
Innate Immunotherapeutics Ltd.
Jazz Pharmaceuticals PLC
Kansas City Southern
L Brands Inc.
Lyondellbasell Industries NV
McKesson Corp.
Nextera Energy Inc.
Northrop Grumman Corp.
PG&E Corp.
Pfizer Inc.
Qihoo 360 Technology Co. Ltd.
Semptra Energy
Starbucks Corp.
Thermo Fisher Scientific, Inc.
Union Pacific Corp.
United Technologies Corp.
Verizon Communications Inc.
Whitewave Foods Corp.
Xerox Corp.
XL Group PLC
Zimmer Biomet Holdings Inc.

With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity

Ms. Elizabeth J. Fischmann

Page 3

until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I will retain limited partnership interests in the following entities that own property rented to healthcare-related tenants (in addition to Chattahoochee Associates, discussed above):

- 1) Diagnostic Ventures of Roswell LLC;
- 2) RMC3, LLC

With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse is employed as a representative in the Georgia state legislature, a position for which she receives a fixed annual salary. I will not participate personally and substantially in any particular matter involving specific parties in which I know the state of Georgia is a party or represents a party, unless, on a case-by-case basis, I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). I will abide by any limitations that are placed on that authorization.

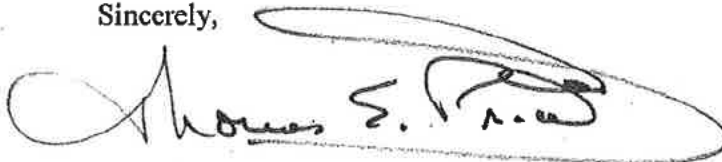
I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

In order to avoid potential conflicts of interest during my appointment as Secretary, I, my spouse, or any minor children of mine will not acquire any direct financial interest in entities listed on the FDA prohibited holdings list or in entities involved, directly or through subsidiaries, in the following industries: (1) research, development, manufacture, distribution, or sale of pharmaceutical, biotechnology, or medical devices, equipment, preparations, treatment, or products; (2) veterinary products; (3) healthcare management or delivery; (4) health, disability, or workers compensation insurance or related services; (5) food and/or beverage production, processing or distribution; (6) communications media; (7) computer hardware, computer software, and related internet technologies; (8) wireless communications; (9) social sciences and economic research organizations; (10) energy or utilities; (11) commercial airlines, railroads, shiplines, and cargo carriers; or (12) sector mutual funds that concentrate their portfolios on one country other than the United States. In addition, we will not acquire any interests in sector mutual funds that concentrate in any of these sectors.

Ms. Elizabeth J. Fischmann
Page 4

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas E. Price, M.D.", enclosed within a large, loopy oval flourish.

Thomas E. Price, M.D.

February 7, 2017

Ms. Elizabeth J. Fischmann
Associate General Counsel for Ethics
Designated Agency Ethics Official
U.S. Department of Health and Human Services
Room 710-E, Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Dear Ms. Fischmann:

The purposes of this letter are to amend the financial disclosure report that I signed on December 15, 2016, and to supplement the ethics agreement that I signed on January 11, 2017.

A) Financial Disclosure Report

To correct inadvertent errors in my December 15, 2016, financial disclosure report, the items identified below are amended, as follows:

Part 1

#	Organization Name	City/State	Organization Type	Position Held	From	To
2	Chattahoochee Associates	Atlanta, Georgia	General Partnership	Managing and General Partner	11/1993	Present

Part 2

#	Description	EIF	Value	Income Type	Income Amount
1	Chattahoochee Associates	no	\$100,001-\$250,000		None (or less than \$201)

Part 6

#	Description	EIF	Value	Income Type	Income Amount
14.55	Amazon Com Inc	n/a	None (or less than \$1,001)	Capital Gains	\$2,501-\$5,000
15.1	Innate Immunotherapeutics Ltd. (INNMF)	n/a	\$15,001-\$50,000		None (or less than \$201)

To correct an inadvertent error in my December 15, 2016, financial disclosure report, the following item is added to that financial disclosure report:

Part 6

#	Description	EIF	Value	Income Type	Income Amount
28	Innate Immunotherapeutics Ltd. (INNMF)	n/a	\$100,001-\$250,000		None (or less than \$201)

Ms. Elizabeth J. Fischmann
Page 2

With regard to the assets disclosed in my December 15, 2016, financial disclosure report other than those listed above, the U.S. Office of Government Ethics has asked me to confirm that I disclosed the current value at the time of reporting. By this letter, I am confirming that I used current value with regard to those assets. This letter makes no changes to the value categories disclosed in that financial disclosure report other than those indicated above.

B) Supplement to January 11, 2017, Ethics Agreement

The new item listed above (Innate Immunotherapeutics Ltd./\$100,001-\$250,000) is covered by the commitment I made in my January 11, 2017, ethics agreement to divest all interests in Innate Immunotherapeutics Ltd. within 90 days of confirmation. In addition, the following commitments supplement my ethics agreement dated January 11, 2017.

In February 2017, I resigned from my position as Managing and General Partner of Chattahoochee Associates and transferred my ownership interest to my spouse. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Chattahoochee Associates, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order no. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I made in the ethics agreement I signed on January 11, 2017.

I have been advised that this supplement to my ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports. I understand that this letter will also be released as an attachment to my public financial disclosure report.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas E. Price", with a large, stylized flourish extending from the end of the signature.


Thomas E. Price, M.D.

Referral to EPA



From: Stephanie Nonluecha [mailto:snonlue@oge.gov]

Sent: Monday, December 19, 2016 5:46 PM

To: Fort, Daniel ^{(b) (6)} 

Subject: RE: Questions to pose to my nominee [WARNING: SPF validation failed]

Importance: High

Thanks Dan. I added my comments in tracked changes. Note that some of my comments overlap with yours in other parts of the document, but you may edit as you deem appropriate before sending to the filer.

Best,
Stephanie

Referral to EPA



From: [Stephanie Nonluecha](#)
To: ["Fort, Daniel"](#)
Subject: RE: We finished our initial review, but can't contact the nominee directly
Date: Tuesday, December 20, 2016 3:43:03 PM

Dan,

The contact for him is Reginald (or Reg) Brown at WilmerHale, and he can be reached at (b) (6). Please let me know if you need anything further.

Thanks,
Stephanie

Referral to EPA

From: Stephanie Nonluecha [<mailto:snonlue@oge.gov>]
Sent: Tuesday, December 20, 2016 9:52 AM
To: Fort, Daniel (b) (6) >
Subject: RE: Questions to pose to my nominee [WARNING: SPF validation failed]

That's correct—(b) (5) I'm still waiting for his contact information, and will send it asap. (b)(3), (5), (6)

Referral to EPA

From: Stephanie Nonluecha [<mailto:snonlue@oge.gov>]
Sent: Monday, December 19, 2016 5:46 PM
To: Fort, Daniel <(b) (6)>
Subject: RE: Questions to pose to my nominee [WARNING: SPF validation failed]
Importance: High

Thanks Dan. I added my comments in tracked changes. Note that some of my comments overlap with yours in other parts of the document, but you may edit as you deem appropriate before sending to the filer.

Best,
Stephanie

Referral to EPA



From: [Stephanie Nonluecha](#)
To: ["Fort, Daniel"](#)
Subject: RE: So, OGE is telling me that...
Date: Tuesday, December 20, 2016 4:00:59 PM

Correct, this is the representative who will be handling Mr. Pruitt's report. The transition team provided the phone number only, but since it matches the public information for Mr. Brown, I'm sure the e-mail is correct. However, you may want to call first in case that's the preferred communication method at the start.

Referral to EPA



From: Stephanie Nonluecha [<mailto:snonlue@oge.gov>]
Sent: Tuesday, December 20, 2016 3:43 PM
To: Fort, Daniel (b) (6)
Subject: RE: We finished our initial review, but can't contact the nominee directly [WARNING: SPF validation failed]

Dan,

The contact for him is Reginald (or Reg) Brown at WilmerHale, and he can be reached at (b) (6). Please let me know if you need anything further.

Thanks,
Stephanie

Rest of chain mentioned above



Referral to EPA



Referral to EPA



From: [Stephanie Nonluecha](#)
To: (b)(6) - Ann Donaldson's email address
Cc: "Fort, Daniel"; "Fugh, Justina"
Subject: (b) (5)
Date: Thursday, December 22, 2016 6:25:00 PM
Attachments: (b) (5)

1 page attachment withheld in full - (b)(3), (4), (5), (6)

Please see attachment.

Regards,

Stephanie Nonluecha

Program Analyst (Finance)
U.S. Office of Government Ethics
(202) 482-9243
snonlue@oge.gov

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: Deborah J. Bortot
Sent: Thursday, December 22, 2016 6:23 PM
To: 'Ann M Donaldson'
Cc: (b)(6) - Daniel Fort's email address; (b)(6) - Justina Fugh's email address; Stephanie Nonluecha; Emory A. Rounds III; David J. Apol; Teresa L. Williamson; Sandra S. Mabry; Heather A. Jones; Keith Labedz; Rodrick T. Johnson
Subject: (b) (5)

(b) (5)

Thanks!
Deb

Deborah J. Bortot
Chief, Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9227
Facsimile: (202) 482-9237

From: [Teresa L. Williamson](#)
To: [Stephanie Nonluecha](#); [Megan V. Khaner](#)
Subject: FW: AG Scott Pruitt
Date: Friday, December 23, 2016 8:13:30 AM
Importance: High

Please contact the agency for the final paperwork so that we can forward to the Senate committee.
I have prepared the Senate transmittal letter.

Thanks!
Teresa

From: Deborah J. Bortot
Sent: Friday, December 23, 2016 8:07 AM
To: Teresa L. Williamson; Megan V. Khaner; Stephanie Nonluecha; Emory A. Rounds III
Subject: FW: AG Scott Pruitt

From: Ann M Donaldson (b) (6)
Sent: Thursday, December 22, 2016 9:05 PM
To: Deborah J. Bortot; Heather A. Jones
Subject: AG Scott Pruitt

On behalf of the President-Elect, this email serves as confirmation that the President-Elect intends to nominate Attorney General Scott Pruitt to be Administrator of the Environmental Protection Agency.
Please transmit his pre-cleared 278 report to the appropriate Senate committee.
Thank you,
Annie

Ann M. Donaldson
Associate
[JONES DAY® - One Firm WorldwideSM](#)
51 Louisiana Avenue, NW
Washington, DC 20001
Office (b) (6)

=====
This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.
=====

From: [Megan V. Khaner](#)
To: ["Fugh, Justina"](#)
Cc: [Stephanie Nonluecha](#); [Fort, Daniel](#)
Subject: RE: Pruitt [WARNING: SPF validation failed]
Date: Friday, December 23, 2016 10:24:43 AM

Thank you for the update!
m

Referral to EPA



From: Megan V. Khaner [<mailto:mykhaner@oge.gov>]
Sent: Friday, December 23, 2016 9:33 AM
To: Fort, Daniel <(b) (6)>
Cc: Fugh, Justina <(b) (6)>
Subject: Pruitt [WARNING: SPF validation failed]

The President-Elect intends to nominate Attorney General Scott Pruitt to be Administrator of the Environmental Protection Agency. Please send me the final paperwork for Pruitt and make sure the final report is signed and certified in *Integrity*.

Megan Khaner
Program Analyst (Finance)
Presidential Nominations Branch
General Counsel and Legal Policy Division
202.482.9204

From: [Deborah J. Bortot](#)
To: [Stephanie Nonluecha](#); (b) (5) - Justina Fugh's email address
Cc: [Heather A. Jones](#)
Subject: RE: revised ethics agreement for Scott Pruitt, EPA
Date: Tuesday, December 27, 2016 1:16:52 PM

Justina,

As we explain in the Guide to Drafting Ethics Agreement for PAS Nominees, (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Thanks,
Deb

Deborah J. Bortot
Chief, Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9227
Facsimile: (202) 482-9237

(b) (5)

[REDACTED]

(b) (5)



From: Stephanie Nonluecha
Sent: Tuesday, December 27, 2016 10:44 AM
To: Deborah J. Bortot
Subject: FW: revised ethics agreement for Scott Pruitt, EPA
Importance: High

3 page attachment withheld in full - (b)(3), (4), (5), (6)



Hi Deb,

Per my voicemail, here's the background information I received from EPA concerning Mr. Pruitt's attorneys' suggested revision to his EA.

Stephanie

Referral to EPA



Referral to EPA



From: [Deborah J. Bortot](#)
To: [Stephanie Nonluecha](#); (b)(6) - Justina Fugh's email address
Cc: (b)(6) - Daniel Fort's email address
Subject: RE: revised ethics agreement for Scott Pruitt, EPA
Date: Tuesday, December 27, 2016 2:57:29 PM
Attachments: [EA for preclearance.Pruitt, Scott 12-27-16.docx](#)

1 page attachment withheld in full - (b)(3), (4), (5), (6)

Justina,

We have addressed all of the representative's concerns. I've attached a revised ethics agreement with the changes tracked.

Thanks,
Deb

From: Stephanie Nonluecha
Sent: Tuesday, December 27, 2016 10:44 AM
To: Deborah J. Bortot
Subject: FW: revised ethics agreement for Scott Pruitt, EPA
Importance: High

3 page attachment withheld in full - (b)(3), (4), (5), (6)

Hi Deb,

Per my voicemail, here's the background information I received from EPA concerning Mr. Pruitt's attorneys' suggested revision to his EA.

Stephanie

Rest of chain mentioned above

From: [Deborah J. Bortot](#)
To: ["Fugh, Justina"; Stephanie Nonluecha](#)
Cc: [Fort, Daniel](#); [Heather A. Jones](#)
Subject: RE: revised ethics agreement for Scott Pruitt, EPA [WARNING: SPF validation failed]
Date: Tuesday, December 27, 2016 3:16:49 PM

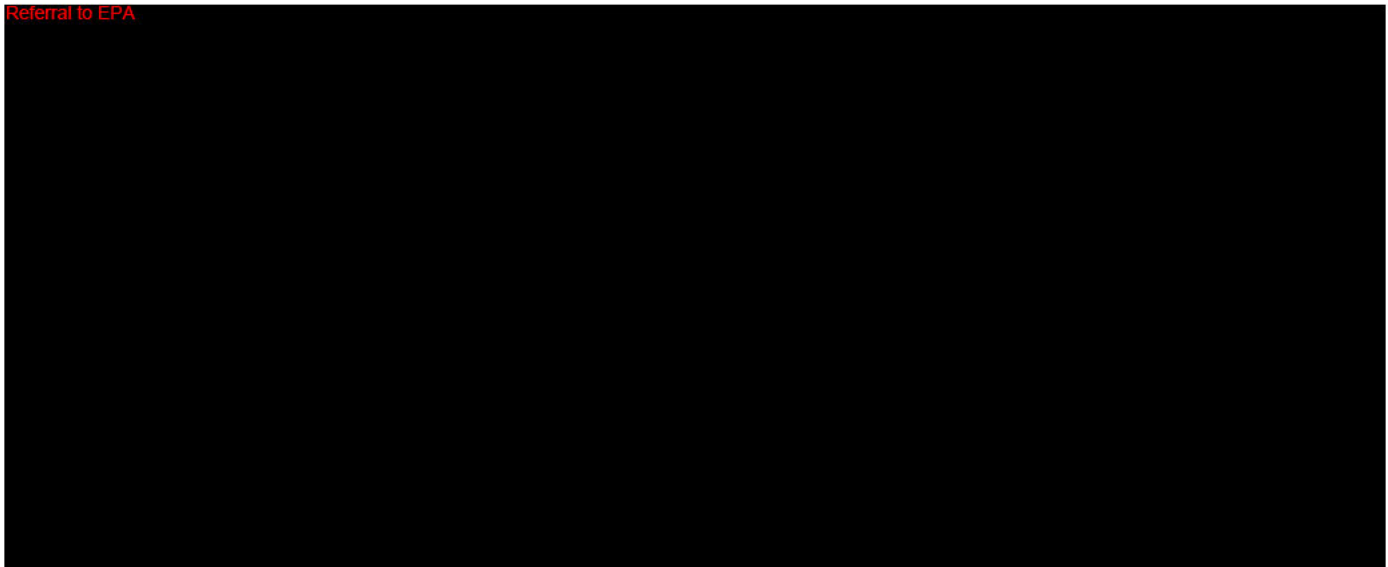
Justina,

(b) (5)

A large black rectangular redaction box covering several lines of text.

Thanks,
Deb

Referral to EPA

A large black rectangular redaction box covering the majority of the email body.

Rest of chain mentioned above

A large black rectangular redaction box covering the bottom portion of the email body.

Referral to EPA

A large rectangular black box redacting the majority of the page content.

Referral to EPA

A large rectangular black box redacting the majority of the page content.

Rest of chain mentioned above

A large rectangular black box redacting the majority of the page content.

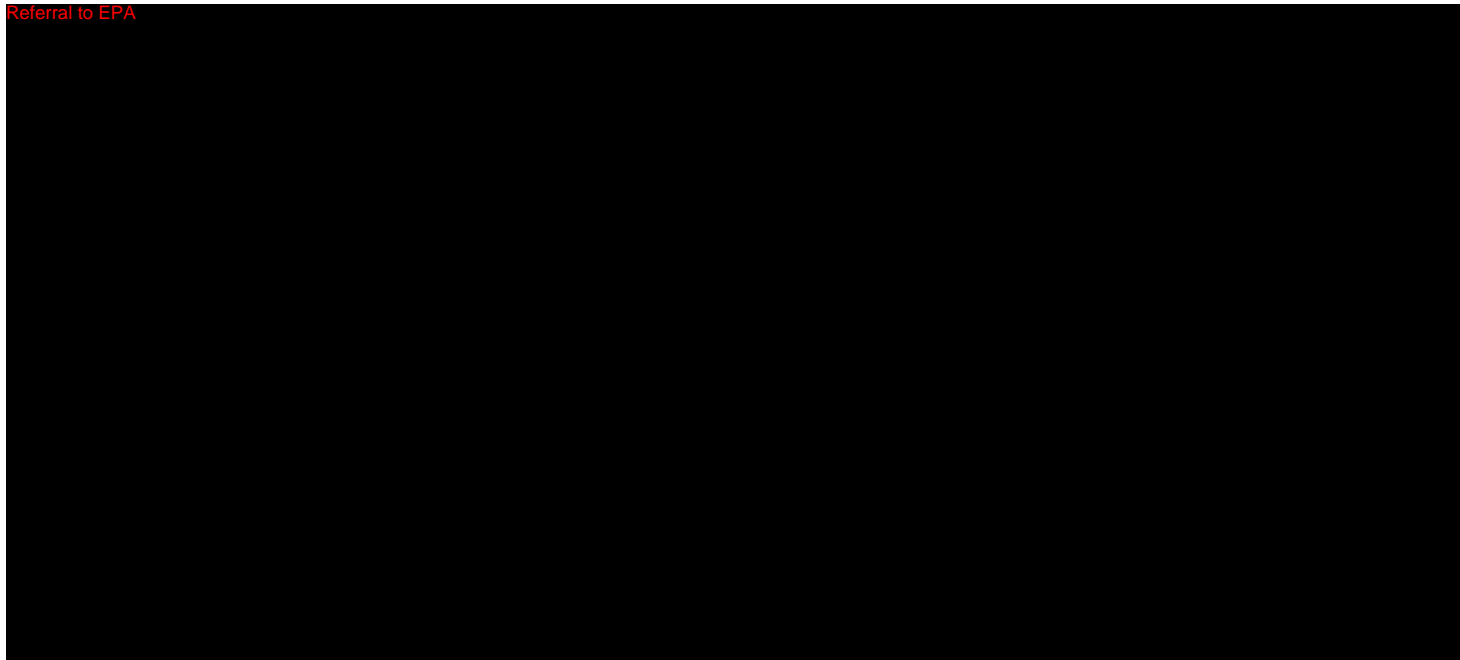
From: [Heather A. Jones](#)
To: [Fugh, Justina](#); [Deborah J. Bortot](#); [Stephanie Nonluecha](#)
Cc: [Fort, Daniel](#)
Subject: Re: Pruitt -- revised ethics agreement
Date: Wednesday, December 28, 2016 11:13:27 AM

(b) (5)

. Did his
representative sign off on the EA.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

Referral to EPA



Referral to EPA



Rest of chain mentioned above



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Referral to EPA

From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Wednesday, December 28, 2016 1:35 PM
To: Fugh, Justina (b) (6); Stephanie Nonluecha <snonlue@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>
Cc: Fort, Daniel (b) (6)
Subject: RE: Pruitt -- revised ethics agreement [WARNING: SPF validation failed] [WARNING: SPF validation failed]

You can do it. You just need to go into the report. If you can't, I'm in it and can do it.

Referral to EPA

From: Stephanie Nonluecha [mailto:snonlue@oge.gov]
Sent: Wednesday, December 28, 2016 12:33 PM
To: Fugh, Justina (b) (6); Heather A. Jones <hajones@oge.gov>; Deborah J. Bortot <djbortot@oge.gov>
Cc: Fort, Daniel (b) (6)
Subject: RE: Pruitt -- revised ethics agreement [WARNING: SPF validation failed] [WARNING: SPF validation failed]

Hi Justina,

No attachment found in search

(b) (5). Please see tracked changes in attachment.

Thanks,
Stephanie

Referral to EPA



From: [Stephanie Nonluecha](#)
To: (b)(6) - Ann Donaldson's email address
Cc: "[Fugh, Justina](#)"; "[Fort, Daniel](#)"
Subject: FW: PRECLEARED: Edward Scott Pruitt
Date: Wednesday, December 28, 2016 6:29:22 PM
Attachments: [EA for preclearance.Pruitt, Scott.precleared 12-28-16.docx](#)

1 page attachment withheld in full - (b)(3), (4), (5), (6)

Please see precleared ethics agreement attached.

Regards,

Stephanie Nonluecha
Program Analyst (Finance)
U.S. Office of Government Ethics
(202) 482-9243
snonlue@oge.gov

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: Deborah J. Bortot
Sent: Wednesday, December 28, 2016 5:12 PM
To: 'Ann M Donaldson'
Cc: (b)(6) - Daniel Fort's email address; (b)(6) - Justina Fugh's email address; Stephanie Nonluecha; Emory A. Rounds III; David J. Apol; Heather A. Jones; Keith Labedz
Subject: PRECLEARED: Edward Scott Pruitt

Annie,

Edward Scott Pruitt is precleared. We received confirmation that he will sign the latest version of the ethics agreement. Stephanie, please forward the ethics agreement to Annie.

Thanks,
Deb

Deborah J. Bortot
Chief, Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9227
Facsimile: (202) 482-9237

Rest of chain mentioned above

From: [Stephanie Nonluecha](#)
To: [Deborah J. Bortot](#)
Subject: FW: PRECLEARED: Edward Scott Pruitt
Date: Friday, December 30, 2016 3:03:01 PM

As requested.

Referral to EPA



From: Brown, Reginald <(b) (6)>
Sent: Friday, December 30, 2016 10:52 AM
To: Fugh, Justina <(b) (6)>
Cc: Fort, Daniel <(b) (6)>
Subject: Re: PRECLEARED: Edward Scott Pruitt

He is arriving home today and will sign this evening. Thx

Sent from my iPhone

Referral to EPA



Referral to EPA

From: Stephanie Nonluecha [<mailto:snonlue@oge.gov>]

Sent: Thursday, December 29, 2016 12:07 PM

To: Fugh, Justina (b) (6)

Cc: Fort, Daniel (b) (6)

Subject: FW: PRECLEARED: Edward Scott Pruitt [WARNING: SPF validation failed]

Importance: High

The attachment is an email and the content of the attachment can be found on page 10

Hi Justina (and Dan),

We received confirmation that the previous notice of intent to nominate Scott Pruitt to be Administrator of the Environmental Protection Agency still stands (see previous notice in attached e-mail). Please have Mr. Pruitt re-submit his 278 in Integrity and sign his EA. Please forward the signed EA along with the agency cover letter to OGE.

Thanks,
Stephanie

From: LNAPPS1.USOGE@oge.gov
To: [Sandra S. Mabry](#)
Subject: IMPORTANT - ACTION NEEDED - Nomination Package Forwarded to Sandy for Review - Edward Scott Pruitt
Date: Wednesday, January 04, 2017 12:26:27 PM

Nomination package for Edward Scott Pruitt has been forwarded for review.

ACTION: Review nomination package and initial paper routing slip. Log completion of this step into FDTS by clicking the forward routing button to save and mark this step complete.

Drop the paper folder off in General Counsel's office.

The link below will take you to the FDTS record.

nonresponsive website info

From: [Integrity.gov](https://integrity.gov)
To: [Sandra S. Mabry](#)
Subject: Integrity.gov: Report Pending Action
Date: Wednesday, January 04, 2017 12:31:52 PM

A 2017 Nominee report for Pruitt, Edward Scott is pending your action as OGE Nominee Program Manager. You may access the report by logging into integrity at <https://integrity.gov>.

From: [Bodine, Susan \(EPW\)](#)
To: [Teresa L. Williamson](#)
Cc: [Deborah J. Bortot](#); [Sandra S. Mabry](#); [Rodrick T. Johnson](#); [Heather A. Jones](#); (b)(6) - Ann Donaldson's email address
Subject: RE: Public Financial Disclosure Report of Edward Scott Pruitt
Date: Wednesday, January 04, 2017 1:50:35 PM

Teresa, I don't remember, does OGE post these on their website?

From: Teresa L. Williamson [mailto:tlwillia@oge.gov]
Sent: Wednesday, January 04, 2017 1:40 PM
To: Bodine, Susan (EPW)
Cc: Deborah J. Bortot; Sandra S. Mabry; Rodrick T. Johnson; Heather A. Jones; (b)(6) - Ann Donaldson's email address
Subject: Public Financial Disclosure Report of Edward Scott Pruitt

Final EA and final senate letter released below.
278 financial disclosure report withheld in full - (b)
(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Good Afternoon,

I've attached the financial disclosure package for Edward Scott Pruitt. President-Elect Trump has announced his intention to nominate Mr. Pruitt for the position of Administrator, Environmental Protection Agency.

The hard copy of the attached documents will be placed at OGE reception for pick up by a Senate rider page per our agreement. If you have any questions, please contact Teresa Williamson @ 202-482-9283.

Please respond to this message to confirm receipt of the attached package, and please let me know in your response whether you will send a Senate rider page.

Thanks!

Teresa Williamson
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9283

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From: [Seth Jaffe](#)
To: [Elizabeth D. Horton](#); [Sandra S. Mabry](#)
Cc: ["Jen Matis"](#)
Subject: RE: Conference call with EPW member staffers and OGE
Date: Tuesday, January 10, 2017 10:50:09 AM

Elizabeth,

I can make 3:30pm on Thursday.

Seth

From: Elizabeth D. Horton
Sent: Tuesday, January 10, 2017 10:14 AM
To: Sandra S. Mabry; Seth Jaffe
Cc: 'Jen Matis'
Subject: FW: Conference call with EPW member staffers and OGE

Good morning Sandy and Seth.

Sandy – are you available on Thursday at 3:00 for the telephone briefing instead of Wednesday at 2:00?

Seth – are you available around 3:30 on Thursday?

From: Thomas, Katie (Sanders) (b) (6)
Sent: Monday, January 09, 2017 8:57 PM
To: Jennifer Matis
Cc: Akerlof, Karen (Sanders); Elizabeth D. Horton
Subject: Re: Conference call with EPW member staffers and OGE

Hi again,

Thank you very much for this offer. There are several offices who are interested in both questions. Are you free 3-4 Thursday? We could do oge ethics overview at 3 and the call re the ethics agreement at 330?

Thanks again,

Katie Thomas
Policy Advisor for Energy and Environment
Senator Bernie Sanders
332 Dirksen Senate Office Building

(b) (6)

Sent from my phone, so please excuse any errors.

On Jan 9, 2017, at 5:42 PM, Jennifer Matis <jmatis@oge.gov> wrote:

Hi,

It would be best to split the two issues into two separate calls. We have someone from our Presidential Nominations Branch that can do a general overview of the process. My colleague Liz, who I included on this email, will join her on that call. Is Wednesday at 2 pm good for you for that? We could also find other times on Wednesday or Thursday if that doesn't work for you.

With regard to the questions about ethics agreements, the head of our Ethics Law and Policy Branch can assist you. I will join him on that call. He is available on Thursday any time before 4 (meaning the call would have to end by 4). Is there a time on Thursday morning or early afternoon that would work for you for that call?

Thanks,

Jen

Jennifer Matis
Assistant Counsel
Legal, External Affairs and Performance Branch
U.S. Office of Government Ethics
202-482-9216
jennifer.matis@oge.gov

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

From: Thomas, Katie (Sanders) [REDACTED]
Sent: Monday, January 09, 2017 3:17 PM
To: Jennifer Matis
Cc: Akerlof, Karen (Sanders)
Subject: Conference call with EPW member staffers and OGE

Ms. Matis,

I got to speak with a few other offices regarding Pruitt's Ethics agreement. I am now hoping that we can find a time this week to do a more general briefing on the OGE process for nominees because the briefing I went to was a bad time for others. Is that possible? I would like to do that *in addition* to discussing what possible tools Senators have for asking for additional OGE review or a change to the ethics agreement.

Please let me know if that is possible. I am very open Wednesday and Thursday.

Thanks
KT

Katie Thomas

Policy Advisor for Energy and Environment
Senator Bernie Sanders
332 Dirksen Senate Office Building

(b) (6)

Visit Senator Sanders' Online Resources:

[Website](#) | [Facebook](#) | [Twitter](#) | [You Tube](#) | [Bernie Buzz](#)

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UNITED STATES OFFICE OF
GOVERNMENT ETHICS



JAN - 4 2017

The Honorable James M. Inhofe
Chairman
Committee on Environment and
Public Works
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Edward Scott Pruitt. President-Elect Trump has announced his intention to nominate Mr. Pruitt for the position of Administrator, Environmental Protection Agency.

We have reviewed the report and have obtained advice from the agency concerning any possible conflict in light of its functions and the nominee's proposed duties. Also enclosed is an ethics agreement outlining the actions that the nominee will undertake to avoid conflicts of interest. Unless a date for compliance is indicated in the ethics agreement, the nominee must fully comply within three months of confirmation with any action specified in the ethics agreement.

Based thereon, we believe that this nominee is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,



Walter M. Shaub, Jr.
Director

Enclosures

JAN 03 2017

Mr. Kevin S. Minoli
Designated Agency Ethics Official
U.S. EPA (2310A)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Minoli:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Administrator of the United States Environmental Protection Agency.

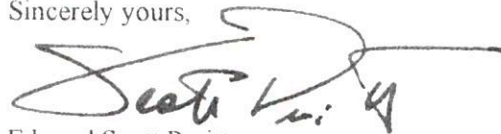
As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my positions with the following entities: Southern Baptist Theological Seminary, and the Windows Ministry Incorporated. I resigned from my position with the Rule of Law Defense Fund on December 8, 2016. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my position as Attorney General of the State of Oklahoma. For a period of one year after my resignation, I will have a "covered relationship" under 5 C.F.R. § 2635.502 with the State of Oklahoma. Pursuant to 5 C.F.R. § 2635.502(d), I will seek authorization to participate personally and substantially in particular matters involving specific parties in which I know the State of Oklahoma is a party or represents a party.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely yours,



Edward Scott Pruitt